

UNITED STATES SOUTHERN DISTRICT
SOUTHERN DISTRICT OF NEW YORK

GRAHAM CHASE ROBINSON,

No. 1:19-CV-09156

Plaintiff,

(LTS) (KHP)

vs.

ROBERT DE NIRO AND CANAL
PRODUCTIONS, INC.,

Defendants.

REMOTE VIDEOTAPED DEPOSITION OF SABRINA WEEKS-BRITTAN

JANUARY 10, 2022

8:36 a.m.

Beverly Hills, California

Diana Janniere, CSR-10034

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CANAL PRODUCTIONS

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GRAHAM CHASE ROBINSON

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11 2 Chat: 116 messages between Gillian
Spear, Michael Kaplan, and Sabrina;
Bates stamped CANAL_0047395 105

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13 3 23 messages between Gillian Spear,
Kevin Rivas, Sabrina Weeks-Brittan
and Tiffany Chen; Bates stamped
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14 4 Ms. Robinson's AMEX and some flower
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15 5 Flower receipts; Bates stamped
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17 6 Breakdown of Ms. Robinson's Uber
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19 7 Ms. Robinson's use of Bob's Delta
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20 8 Ms. Robinson's petty cash;
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22 (Original Exhibits 1 - 8 are attached

23 hereto.)

1 REMOTE VIDEOTAPED DEPOSITION OF SABRINA WEEKS-BRITTAN
2 JANUARY 10, 2022

3

4 THE VIDEOGRAPHER: All right. We are now on
5 the record.

6 This begins videotape No. 1 in the
7 deposition of Sabrina Weeks-Brittan, in the matter of
8 "Graham Chase Robinson versus Robert De Niro and Canal
9 Productions, Incorporated."

10 Today is January 10th, 2022, and the time is
11 8:36 a.m. Pacific Standard Time. This deposition is
12 being taken remotely via Zoom at the request of
13 Sanford Heisler Sharp, LLP.

14 The videographer is Dan Honegger of Magna
15 Legal Services and the court reporter -- court
16 reporter is Diana Janniere of Magna Legal Services.

17 Will counsel and all parties present state
18 their appearances and whom they represent.

19 MS. MACMULLIN: My name is Kate MacMullin.
20 I'm an attorney from Sanford Heisler Sharp and I
21 represent the plaintiff, Graham Chase Robinson.

22 MS. HARWIN: Alexandra Harwin, attorney from
23 Sanford Heisler Sharp, also on behalf of plaintiff,
24 Graham Chase Robinson.

25 MR. HEISLER: Jeremy Heisler, an attorney

1 with Sanford Heisler Sharp, on behalf of plaintiff,
2 Graham Chase Robinson.

3 MS. SLOAN: This is Annie Sloan, an attorney
4 from Sanford Heisler Sharp, also on behalf of the
5 plaintiff, Graham Chase Robinson.

6 MR. MARGOLIS: This is Jeremy Margolis, a
7 legal assistant at Sanford Heisler Sharp, also on
8 behalf of the plaintiff, Graham Chase Robinson.

9 MR. BENNETT: Gregory Bennett on behalf of
10 all defendants; Traub Lieberman Straus & Shrewsberry.

11 MR. HARVEY: Tom Harvey for Canal
12 Productions, Inc. and Robert De Niro.

13 MS. LAZZARO: Brittany Lazzaro from Tarter
14 Krinsky & Drogin, on behalf of Defendant Canal
15 Productions.

16 MR. DROGIN: Laurent Drogin from Tarter
17 Krinsky & Drogin on behalf of Canal Productions.

18 MS. MACMULLIN: Good morning,
19 Ms. Weeks-Brittan. My name is Kate MacMullin. I'm an
20 attorney from Sanford Heisler Sharp and I represent
21 the plaintiff, Graham Chase Robinson. Thank you for
22 being here today for your deposition.

23 Before we begin, I'm going to explain to you
24 some of the ground rules for your deposition.

25 THE REPORTER: Hold on. I need to swear in

1 the witness.

2 MS. MACMULLIN: Oh, I'm sorry.

3 THE REPORTER: That's okay.

4

5 SABRINA WEEKS-BRITTAN,

6 having been first duly sworn, testifies as follows:

7

8 EXAMINATION

9 BY MS. MACMULLIN:

10 Q Okay. So I will walk through some of the
11 ground rules for your deposition. I will ask you
12 questions. And both my questions and your answers
13 will be recorded by the court reporter.

14 Both of us need to speak up and speak
15 clearly, and slowly, so that the court reporter can
16 record everything.

17 Do you understand that?

18 A I do.

19 Q Also, you must answer verbally because the
20 court reporter cannot record a nod or a shake of the
21 head.

22 Do you understand that?

23 A I do.

24 Q Please wait until I finish my question
25 before you start answering. If you don't understand

1 my question for any reason, don't answer it, and
2 instead, please ask me for clarification.

3 If you do answer the question, however, we
4 will assume that you understood the question.

5 Do you understand that?

6 A Yes.

7 Q Also, if you need a break at any time or for
8 any reason, you should tell me and we'll finish your
9 answer if we're in the middle of it, and then take a
10 break.

11 The only time you can't take a break is if a
12 question is pending.

13 Do you understand that?

14 A Yes.

15 Q Your attorney may object from time to time,
16 but unless he or she instructs you not to answer, you
17 should answer my question.

18 Do you understand that?

19 A Yes.

20 Q If you answer a question and later on you
21 remember some additional information or you would like
22 to clarify your earlier response, please tell me that
23 you would like to add something to an earlier answer,
24 and I'll give you the opportunity to do that.

25 Do you understand that?

1 A Yes.

2 Q If I use a term or abbreviation incorrectly,
3 please correct my usage, so that we can make sure that
4 we all have the same understanding of what the record
5 means.

6 Do you understand that?

7 A Yes.

8 Q When I refer to "Canal," I'm referring to
9 Canal Productions, Incorporated. And if you're -- if
10 you're unsure about what I mean by any term, please
11 let me know.

12 A Okay.

13 Q Is there -- is there any instruction I have
14 provided that you do not understand or do not agree
15 with?

16 A No, I'm clear.

17 Q This testimony is under oath just as if you
18 were in a court of law. This testimony may be used as
19 evidence in this case.

20 Do you understand that?

21 A Yes.

22 Q Do you have any electronic screens or
23 communication devices with you in the room that you're
24 in right now?

25 A No, just the laptop I'm on.

1 Q Is there anyone else in the room with you
2 today?

3 A No.

4 Q Do you understand your obligation to provide
5 testimony that is truthful and complete?

6 A I do.

7 Q Do you consider yourself an honest person?

8 A I do.

9 Q Do you consider it important to tell the
10 truth?

11 A I do.

12 Q Do you understand that you're required to
13 tell the truth here today even if it might be hurtful
14 to Mr. De Niro?

15 A I understand.

16 Q What is your full name?

17 A Sabrina Tipton Weeks-Brittan.

18 Q Have you ever gone by another name?

19 A No.

20 Q And do you go by Ms. Weeks-Brittan,
21 Ms. Weeks, or anything else?

22 A Ms. Weeks-Brittan.

23 Q What is your date of birth?

24 A [REDACTED]

25 Q What is your home address?

1 A [REDACTED]

2 [REDACTED]

3 Q How long have you resided at that address?

4 A About a year.

5 Q Do you live alone?

6 A No.

7 Q Who lives with you?

8 A A roommate.

9 Q Are you married?

10 A No.

11 Q Do you have any children?

12 A No.

13 Q Do you suffer from any condition that
14 affects your memory?

15 A Nope.

16 Q Have you consumed any substances that affect
17 your memory or ability to communicate today?

18 A No.

19 Q Is there any reason physically or mentally
20 that you are not able to testify today truthfully and
21 completely?

22 A No reason.

23 Q Other than this case, have you ever been
24 involved in any other lawsuit or any other judicial,
25 arbitral, or administrative proceeding either as a

1 party or a witness?

2 MR. BENNETT: Objection.

3 You can answer.

4 THE WITNESS: Not as a party or a witness,
5 but I interned at the U.S. Attorney's Office for the
6 Southern District in college.

7 BY MS. MACMULLIN:

8 Q Have you ever testified under oath before?

9 A I don't believe so, but I was almost on jury
10 duty a few years ago. And I'm not sure if I was under
11 oath or not.

12 Q Have you ever provided a sworn statement,
13 declaration, or affidavit related to any lawsuit or
14 any other judicial, arbitral, or administrative
15 proceeding?

16 MR. BENNETT: Objection.

17 You can answer.

18 THE WITNESS: I don't think so. I'm not
19 sure if I've already signed anything for this, but I
20 don't think so.

21 BY MS. MACMULLIN:

22 Q Do you recall providing any testimony or any
23 sworn statement in this case?

24 MR. BENNETT: I'm going to object to the
25 extent that, Ms. Weeks-Brittan, you don't need to

1 provide any information responsive to that question if
2 it relates to conversations you had with legal
3 counsel. Otherwise, you can answer the question.

4 THE WITNESS: Okay. Then, I think the
5 answer is no.

6 BY MS. MACMULLIN:

7 Q Have you ever provided any testimony -- let
8 me rephrase.

9 Have you provided a sworn statement,
10 regardless of whether it was to counsel or not?

11 MR. BENNETT: Objection.

12 THE REPORTER: This is the reporter. I
13 didn't hear the answer.

14 THE WITNESS: I said no.

15 BY MS. MACMULLIN:

16 Q Have you ever been convicted of a criminal
17 offense?

18 A No.

19 Q Have you ever been charged or arrested in
20 connection with a criminal offense?

21 MR. BENNETT: Objection.

22 THE WITNESS: No.

23 MR. BENNETT: You can go ahead and answer.

24 BY MS. MACMULLIN:

25 Q Have you ever been accused of making any

1 false statement?

2 A No.

3 Q You are represented by Traub Lieberman, and
4 Tarter, Krinsky & Drogin in this deposition; is that
5 correct?

6 A Correct.

7 Q Have you been represented by any other
8 attorney in connection with the lawsuit brought by
9 Ms. Robinson against Mr. De Niro and Canal or in
10 Canal's lawsuit or counterclaims against Ms. Robinson?

11 MR. BENNETT: Objection.

12 You can answer.

13 THE WITNESS: I don't know if Tom Harvey is
14 part of either of those firms.

15 BY MS. MACMULLIN:

16 Q Does Tom Harvey represent you?

17 A Canal Productions.

18 Q Tom Harvey represents Canal Productions?

19 A Correct.

20 Q When did you first come to be represented by
21 Traub Lieberman?

22 A I don't understand. Like, at the start of
23 this case or right now? I haven't sought their
24 services other than for this.

25 Q And when you say, "other than for this," do

1 you mean for this deposition today?

2 A Yes.

3 Q When did you first speak to an attorney from
4 Traub Lieberman?

5 A Maybe E-mail correspondence with Greg
6 probably since 2019.

7 Q On how many occasions have you spoken to an
8 attorney from Traub Lieberman?

9 MR. BENNETT: Objection.

10 You can answer.

11 THE WITNESS: Spoken in person, maybe one to
12 two times. Some E-mails back and forth, a handful.

13 BY MS. MACMULLIN:

14 Q When did you first come to be represented by
15 Tarter Krinsky & Drogin?

16 A I don't really know. I was just under the
17 assumption they were representing Canal Productions.

18 Q When did you first speak to an attorney from
19 Tarter Krinsky & Drogin?

20 A Can you --

21 MR. BENNETT: Objection.

22 THE WITNESS: -- rephrase?

23 MR. BENNETT: With respect to this -- with
24 respect to this case or -- or otherwise? If you could
25 just clarify that, please.

1 BY MS. MACMULLIN:

2 Q When is the first time that you spoke to an
3 attorney from Tarter Krinsky & Drogin in general?

4 A I'm not 100 percent sure which attorneys are
5 from Tarter Krinsky & Drogin. I've spoken to Greg
6 Bennett and Tom Harvey in relation to this deposition.

7 Q Understood.

8 Have you spoke to Laurent Drogin at any
9 point?

10 A I don't believe so.

11 Q Have you ever sought or received legal
12 advice from Tom Harvey?

13 A Yes.

14 Q What have you done to prepare for today's
15 deposition?

16 MR. BENNETT: Objection.

17 Don't reveal anything you discussed with
18 counsel, Sabrina. Otherwise, you can answer the
19 question.

20 THE WITNESS: I have spoken to the two
21 attorneys I mentioned in the previous question, Greg
22 Bennett and Tom Harvey. And I've also just generally
23 spoken to my parents, who are lawyers.

24 BY MS. MACMULLIN:

25 Q When did you speak with Greg Bennett and Tom

1 Harvey?

2 A Last week, Thursday.

3 Q Was it just one conversation on Thursday?

4 A It was one conversation, and then I just
5 called Greg one time since.

6 Q And did the first conversation take place by
7 video or by phone?

8 A By phone.

9 Q And approximately how long did you speak
10 with Tom Harvey and Greg Bennett for on Thursday?

11 A Maybe three hours.

12 Q And about how long was your follow-up call
13 with Mr. Bennett?

14 A Thirty seconds.

15 Q Were there any non-attorneys present during
16 either of those conversations?

17 A No.

18 Q Could anyone overhear your conversations
19 with Mr. Harvey or Mr. Bennett?

20 A No.

21 MR. BENNETT: Objection.

22 You can answer.

23 BY MS. MACMULLIN:

24 Q And you mentioned that you spoke with your
25 parents about the deposition. Did you tell your

1 parents anything beyond the fact that you were having
2 your deposition taken today?

3 A What qualifies as "beyond the fact"?

4 Q Tell me everything you discussed with your
5 parents about your deposition today.

6 A I just asked them for general advice. I've
7 never been in a deposition before.

8 Q What advice did they give you?

9 A Just to listen to the question. Really
10 respond to the question at hand. Make sure I'm clear
11 on the question.

12 Q Have you spoken -- oh, was there anything
13 else?

14 A No.

15 Q Have you spoken with Mr. De Niro regarding
16 your deposition today?

17 A No.

18 Q Have you spoken with any Canal employees
19 regarding your deposition today?

20 A No.

21 Q Have you reviewed any documents in
22 preparation for your deposition?

23 A No.

24 Q Have you reviewed the Complaint in this
25 case?

1 A Not for a while.

2 Q But did you review it at some point?

3 A At some point, yes, but I don't believe it
4 was in the last year.

5 Q Approximately when did you review it?

6 A Maybe late 2019, early 2020. I reviewed it
7 when it was initially made and then I haven't gone
8 back.

9 Q Did anything you saw in the Complaint come
10 as a surprise to you?

11 MR. BENNETT: Objection.

12 MS. LAZZARO: Objection.

13 MR. BENNETT: You can answer.

14 MS. LAZZARO: Can you just -- can you just
15 clarify which Complaint you're speaking about?

16 MS. MACMULLIN: Sure.

17 BY MS. MACMULLIN:

18 Q I'm speaking about the Complaint filed by
19 Ms. Robinson in this litigation, "Robinson versus
20 De Niro and Canal Productions."

21 A I just want to -- I'm not 100 percent sure
22 I'm thinking of the right thing. I was generally
23 surprised by this case.

24 Q That's what I'm asking about. I'm asking
25 about if I have it right, when you reviewed the

1 Complaint that our law firm filed on behalf of Chase
2 Robinson, was there anything in there that you were
3 surprised by?

4 A Can you briefly summarize it for me? And
5 then, I'll let you know if I was surprised by certain
6 things.

7 Q Well, based on your understanding of what
8 this case is about, was there anything that surprised
9 you?

10 MR. BENNETT: Objection.

11 THE WITNESS: Can I answer?

12 MR. BENNETT: Yes. To the best of your
13 ability, yes.

14 THE WITNESS: I was generally surprised by
15 all of it.

16 BY MS. MACMULLIN:

17 Q Is there -- please explain what you mean by
18 that.

19 A Can -- can you be more specific in the
20 question?

21 Q I'm asking you to explain -- when you say
22 that you were "generally surprised by all of it," I'm
23 asking what you meant by that.

24 A I just don't remember the Complaint well
25 enough, but I was surprised that Chase was bring any

1 sort of claim against Bob.

2 Q Why were you surprised that Ms. Robinson was
3 bringing a claim against Bob?

4 A From my memory of what the Complaint was, I
5 didn't see much validity to the claims. It wasn't my
6 personal experience. So I was just surprised because
7 I wasn't aware of any of those claims at the time.

8 Q Was there anything in the case that you
9 thought might be valid?

10 MR. BENNETT: Objection. Case meaning
11 Complaint?

12 MS. MACMULLIN: Case meaning Complaint, or
13 Ms. Weeks-Brittan's understanding of the claims that
14 are at issue in this lawsuit.

15 MR. BENNETT: Objection.

16 You can answer.

17 THE WITNESS: Can -- can you tell me the
18 claims that are at issue? I just -- I haven't looked
19 at the Complaint in a bit. You know, there's a lot of
20 just like gossip articles as well. I don't want to be
21 mixing things up that aren't in the Complaint. So any
22 clarity would be helpful.

23 BY MS. MACMULLIN:

24 Q This case involves claims about gender
25 discrimination, retaliation, overtime pay; and other

1 matters. So I'm asking if there's anything in those
2 categories of claims that you think might be valid.

3 MS. LAZZARO: Objection.

4 MR. BENNETT: Objection.

5 You can answer.

6 THE REPORTER: There was a female voice. I
7 don't know who said, "Objection." Can you state --
8 was that you, Brittany?

9 MS. LAZZARO: That was me. Thank you.

10 THE REPORTER: Thank you.

11 THE WITNESS: I was surprised. I never
12 experienced gender discrimination from Bob. I have
13 never -- I didn't see any discrimination towards Chase
14 from him.

15 I submitted my expenses and overtime to
16 Chase. I didn't believe Chase was overtime eligible
17 at the time due to her salary and her managerial
18 position over me. A lot of that just was a surprise
19 to me.

20 BY MS. MACMULLIN:

21 Q Have -- what expenses did you submit to
22 Ms. Robinson?

23 A Petty cash. Petty cash expenses. General.

24 If I paid for something that was
25 work-related for Bob or was asked to go somewhere, and

1 take an Uber, I would submit that.

2 Q Are there any other kinds of work-related
3 expenses that you recall submitting to Ms. Robinson?

4 A A wide variety of work-related expenses that
5 I paid out-of-pocket, I detailed in an Excel. She
6 would approve it. I would assume it would be sent to
7 cash and then I would be reimbursed; or I would
8 receive petty cash directly from Chase.

9 Q Have you reviewed the answer and
10 counterclaims that were filed in this case?

11 A I don't think so.

12 Q Did you bring any documents with you today
13 relating to this case?

14 A No.

15 Q Please describe your educational history.

16 A I have a Bachelor's Degree from University
17 of Michigan in political science.

18 Q Did you graduate from high school?

19 A I did.

20 Q When did you graduate from high school?

21 A 2011.

22 Q And what high school did you graduate from?

23 A Latin School of Chicago.

24 Q And then, you just mentioned that you have a
25 Bachelor's Degree in political science from the

1 University of Michigan. When did you receive that
2 degree?

3 A 2015.

4 Q Do you have any post-college higher
5 education?

6 A No.

7 Q Who is your current employer?

8 A Canal Productions.

9 Q And how long have you been employed by
10 Canal?

11 A Mid-July 2018.

12 Q To the present?

13 A To the present.

14 Q And have you worked continuously for Canal
15 from mid-July 2018 to the present?

16 MR. BENNETT: Objection.

17 THE WITNESS: I have.

18 BY MS. MACMULLIN:

19 Q What was your job history before you began
20 working at Canal?

21 A After Michigan, I was hired by Oracle
22 Corporation. I worked in Boston for a year. Promoted
23 to Oracle's New York office in marketing and financial
24 consulting. And then immediately following Oracle, I
25 interviewed and received this job.

1 Q How did you come to work for Mr. De Niro?

2 MR. BENNETT: Objection.

3 You can answer.

4 THE WITNESS: I applied via a friend of a
5 friend, and Chase Robinson interviewed me a handful of
6 times; occasionally, with Michael Kaplan as well.

7 BY MS. MACMULLIN:

8 Q Why did you want to work for Mr. De Niro?

9 A I was eager to switch my career and pivot
10 into entertainment. That's really what I'm passionate
11 about. And I was looking for New York-based
12 entertainment opportunities.

13 Q Did Mr. De Niro hire you to work for Canal?

14 A No, I never interviewed with him. Chase
15 hired me, to be clear.

16 Q Have you had any formal employment agreement
17 with Canal?

18 MR. BENNETT: Objection.

19 You can answer.

20 THE WITNESS: Yes, I received a formal offer
21 letter, a wage notice, an NDA; all from Chase when I
22 received the job.

23 BY MS. MACMULLIN:

24 Q And when you say, "an NDA," is that a
25 Confidentiality Agreement with Canal?

1 A It is. Standard for the industry.

2 Q Do you understand that you're required to
3 testify here completely and truthfully regardless of
4 that Confidentiality Agreement?

5 A I understand that.

6 Q And do you understand that you cannot
7 withhold information at this deposition based on that
8 agreement?

9 A Absolutely.

10 Q You began your employment at Canal as an
11 executive assistant to Mr. De Niro; correct?

12 A Correct.

13 Q And in your role as executive assistant to
14 Mr. De Niro, you reported directly to Mr. De Niro; is
15 that right?

16 MR. BENNETT: Objection.

17 You can answer.

18 THE WITNESS: I reported directly to Chase.

19 BY MS. MACMULLIN:

20 Q Mr. De Niro is the person at Canal, who
21 directed your job duties; is that right?

22 A Both --

23 MR. BENNETT: Objection.

24 You can answer.

25 THE WITNESS: -- Bob and Chase. And I

1 believe it's actually spelled out in my offer letter
2 that anything given by, directed by Chase Robinson or
3 Robert De Niro was in my purview.

4 BY MS. MACMULLIN:

5 Q Did you consider Mr. De Niro to be your
6 boss?

7 A I considered him to be my overall boss, yes.

8 Q Tell me everything that you would do for
9 Mr. De Niro as his executive assistant.

10 MR. BENNETT: Objection.

11 MS. LAZZARO: Objection.

12 THE WITNESS: Pretty much anything asked of
13 me in an executive assistant capacity. Anything asked
14 of me by Chase as well. I considered her my direct
15 manager.

16 Bob oversaw the team. If he asked me to get
17 his agent, to get his publicist, connect you on calls;
18 schedule something; buy him a book that he wanted;
19 highlight a script; stuff like that.

20 And directives also came from Chase, like
21 putting together travel itineraries, sending her a
22 schedule of things, sending Bob a schedule of things
23 once Chase approved that it was correct.

24 Especially at the beginning when I was new,
25 a lot of the checks were done by Chase to make sure I

1 could then send to Bob.

2 BY MS. MACMULLIN:

3 Q Tell me all the job responsibilities that
4 executive assistants at Canal performed during your
5 employment.

6 MS. LAZZARO: Objection to form.

7 MR. BENNETT: Objection. Just -- just to be
8 clear -- and I'm sorry, I don't mean to interrupt the
9 questioning.

10 But there's a 30(b)(6) deposition that's
11 contemplated with respect to policies and practices
12 within Canal. Ms. Weeks-Brittan can testify as to her
13 personal knowledge, but the question was phrased such
14 that it -- I think it borders on that topic.

15 Could -- could we possibly read the question
16 back, please?

17 THE REPORTER: Hold on.

18 (Whereupon, the question was read
19 back as follows:

20 "Q Tell me everything that you
21 would do for Mr. De Niro as his
22 executive assistant.")

23 THE WITNESS: I think it involved all
24 executive assistant duties.

25 Was there a follow-up question?

1 MR. BENNETT: Yeah, I think there was a
2 second question there.

3 THE REPORTER: Let me look. Hold on.

4 Yeah, you are correct.

5 (Whereupon, the question was read
6 back as follows:

7 "Q Tell me all the job
8 responsibilities that executive
9 assistants at Canal performed
10 during your employment.")

11 MR. BENNETT: I'm not trying to disrupt the
12 questioning, but I'll object to the extent that the
13 30(b)(6) is contemplated; but Ms. Weeks-Brittan can
14 certainly testify as to her personal knowledge.

15 You can go ahead and answer, Sabrina.

16 THE WITNESS: My personal knowledge is that
17 as mentioned, when I was hired and I specified the job
18 description, since I came from a very corporate
19 situation and from -- at Oracle and moved to this, I
20 asked for the job description to be spelled out.

21 And it was vaguely just directives given by
22 Chase Robinson and Robert De Niro.

23 BY MS. MACMULLIN:

24 Q During the time when you and Ms. Robinson
25 were both employed at Canal, would executive

1 assistants facilitate Mr. De Niro's travel?

2 A Speaking of my own experience, I would help
3 facilitate his travel, along with travel agents, a
4 charter contact. I would run everything by Chase.

5 She would review travel itineraries before
6 going to Bob. And then, I would send it along to Bob.
7 Or at the time, Gillian Spear would as well.

8 Q During the time when you and Ms. Robinson
9 were both employed at Canal, would executive
10 assistants schedule appointments for Mr. De Niro?

11 A Yes.

12 Q During the time when you and Ms. Robinson
13 were both employed at Canal, would executive
14 assistants schedule calls for Mr. De Niro?

15 A I would schedule calls. I can't -- yes, I
16 would schedule calls depending on the person. Chase
17 would schedule her own calls and Bob's calls at the
18 higher level. Like, maybe his entertainment lawyer if
19 it was reviewing a contract.

20 Q During the time when you and Ms. Robinson
21 were both employed at Canal, would executive
22 assistants schedule meetings for Mr. De Niro?

23 A I would schedule meetings for Mr. De Niro,
24 as would Chase. She would probably schedule different
25 meetings, but I can't speak to that. I would and

1 Gillian would also schedule meetings.

2 Q Ms. Weeks-Brittan, you're generally aware of
3 the job duties of executive assistants, correct?

4 MR. BENNETT: Objection.

5 MS. LAZZARO: Objection to the form.

6 MR. BENNETT: You can answer.

7 THE WITNESS: I think there's a wide array
8 of job duties within this industry. I know my own
9 from being an executive assistant does include
10 meetings, appointments, travel.

11 BY MS. MACMULLIN:

12 Q And you're generally aware of the job duties
13 of executive assistants at Canal; correct?

14 MR. BENNETT: Objection.

15 THE WITNESS: Correct.

16 BY MS. MACMULLIN:

17 Q Okay. During the time when you and
18 Ms. Robinson were both employed at Canal, would
19 executive assistants respond to E-mails directed to
20 Mr. De Niro?

21 MR. BENNETT: Objection.

22 THE WITNESS: Everyone would respond to
23 E-mails occasionally directed towards Bob. Bob would
24 respond to his own E-mails. Chase would respond
25 depending on the level of person we were discussing.

1 Gillian and I would respond at the more nitty-gritty
2 scheduling level as executive assistants.

3 MS. LAZZARO: Kate, I -- I don't mean to
4 interrupt, but can you specify or define executive
5 assistants that you're referring to?

6 Are those just Canal executive assistants or
7 generally in the entertainment industry?

8 MS. MACMULLIN: I'm referring to executive
9 assistants employed by Canal during the time that both
10 Ms. Weeks-Brittan and Ms. Robinson were employed by
11 Canal.

12 MR. BENNETT: Right, but on top of that, it
13 might help to clarify specifically whom you're
14 referring to.

15 Is it Gillian Spear and that's it, or is it
16 someone else? Otherwise, I mean, there's going to be
17 an objection to every one of these questions.

18 THE WITNESS: I was discussing just Gillian
19 and myself, but more myself, since I know what I
20 responded to.

21 BY MS. MACMULLIN:

22 Q During the time when you and Ms. Robinson
23 were both employed at Canal, would executive
24 assistants run errands for Mr. De Niro?

25 MR. BENNETT: Objection.

1 THE WITNESS: Not just Gillian or myself as
2 the executive assistants would run errands. Michael
3 Kaplan, who was not an executive assistant, would run
4 errands frequently. Chase would also frequently run
5 errands and was not an executive assistant.

6 BY MS. MACMULLIN:

7 Q During the time when you and Ms. Robinson
8 were both employed at Canal, would executive
9 assistants make reservations for Mr. De Niro?

10 MR. BENNETT: Objection.

11 THE WITNESS: I made reservations.

12 BY MS. MACMULLIN:

13 Q During the time when you and Ms. Robinson
14 were both employed at Canal, would executive
15 assistants assist Mr. De Niro in selecting birthday
16 gifts?

17 MR. BENNETT: Objection.

18 MS. LAZZARO: Objection.

19 THE WITNESS: We would refer to a birthday
20 list that Chase showed me early in my job. And we
21 would double check with Chase and with Bob if we were
22 kind of in the right wheelhouse.

23 Like, if someone deserved flowers or
24 warranted a more personalized gift, we would clarify
25 that, depending on the person, with Chase and/or Bob.

1 BY MS. MACMULLIN:

2 Q During the time when you and Ms. Robinson
3 were both employed at Canal, would executive
4 assistants assist Mr. De Niro in selecting holiday
5 gifts?

6 MR. BENNETT: Objection.

7 THE WITNESS: I only worked at Canal with
8 Chase for one holiday season and I assisted her a lot
9 with holiday gifts, as did Gillian.

10 All of it was in an effort to handle both
11 Bob's Christmas gifts, Greenwich Hotel staff gifts,
12 building gifts; business acquaintances. It wasn't
13 necessarily all of Bob's personal things, but people
14 in his orbit and in Canal Production's orbit that we
15 wanted to make sure received holiday gifts.

16 BY MS. MACMULLIN:

17 Q During the time when you and Ms. Robinson
18 were both employed at Canal, would executive
19 assistants assist Mr. De Niro in selecting anniversary
20 gifts?

21 MR. BENNETT: Objection.

22 MS. LAZZARO: Objection.

23 THE WITNESS: I did not -- I was hired after
24 Bob and Grace were no longer living together. I
25 believe he maybe still sent Grace flowers. Like,

1 maybe on her birthday as a courtesy, but I wasn't part
2 of selecting anniversary gifts since there wasn't an
3 anniversary.

4 BY MS. MACMULLIN:

5 Q During the time when you and Ms. Robinson
6 were both employed at Canal, would executive
7 assistants assist Mr. De Niro with his home?

8 MR. BENNETT: Objection.

9 MS. LAZZARO: Objection.

10 THE WITNESS: When I started, maybe a month
11 or so later, Chase brought me into this home project
12 when Bob was moving. And Chase and I would go around
13 the city to stores and purchase things for the home.

14 She had me create, like, furniture outlines
15 and would move them around the room accordingly to see
16 where things would go in the space.

17 MS. LAZZARO: Kate, I'm sorry, can you just
18 specify the address and the specific home that you're
19 speaking about?

20 MS. MACMULLIN: Sure. I'm speaking about
21 Mr. De Niro's home at [REDACTED].

22 MS. LAZZARO: Thank you.

23 BY MS. MACMULLIN:

24 Q During the time when you and Ms. Robinson
25 were both employed at Canal, would executive

1 assistants assist Mr. De Niro with his health?

2 MR. BENNETT: Objection.

3 MS. LAZZARO: Objection.

4 THE WITNESS: Like, booking a doctor's
5 appointment, yes, but not -- I'm not a medical
6 professional. I didn't assist with his health in any
7 way other than booking appointments.

8 BY MS. MACMULLIN:

9 Q During the time when you and Ms. Robinson
10 were both employed at Canal, would executive
11 assistants communicate with Mr. De Niro's children?

12 MR. BENNETT: Objection.

13 THE WITNESS: Yes, they -- they would call
14 the office. Whoever picked up the phone would speak
15 to his children. They came to office holiday parties
16 and would pop in and out, as they mostly all live
17 local to New York.

18 BY MS. MACMULLIN:

19 Q During the time when you and Ms. Robinson
20 were both employed at Canal, would executive
21 assistants communicate with Mr. De Niro's girlfriend,
22 Tiffany Chen?

23 MR. BENNETT: Objection.

24 THE WITNESS: Did you ask when Chase and I
25 were both employees?

1 BY MS. MACMULLIN:

2 Q Yes.

3 A I don't think I spoke to Tiffany -- maybe
4 early 2019 one time, but not frequently when Chase and
5 I were both employees of Canal.

6 Q After Ms. Robinson's employment at Canal
7 ended, how frequently would you speak with Ms. Chen?

8 MR. BENNETT: Objection.

9 You can answer.

10 THE WITNESS: It became more frequently when
11 we became more well-acquainted. We just weren't -- I
12 didn't meet her until later in 2019. And then as
13 things came up, either for Bob or their own travel, I
14 communicated with her more frequently to schedule
15 stuff like that.

16 BY MS. MACMULLIN:

17 Q After Ms. Robinson's employment at Canal
18 ended, how frequently would you speak with Ms. Chen?

19 MR. BENNETT: Objection.

20 THE WITNESS: It -- it ramped up based on
21 when I got to know her. Like, it started out
22 infrequent. Now, I do talk or text with her more.
23 She sends pictures of dogs. Not -- not all asks or
24 anything, just I -- I know her better now as it's been
25 a few years.

1 BY MS. MACMULLIN:

2 Q Please quantify how frequently you would
3 speak to Ms. Chen in a typical week.

4 A I'm in a different job capacity now and I
5 live in Los Angeles. So I can't quantify it. It's
6 much less frequently now that I'm not in New York.

7 Q During the second half of 2019, how
8 frequently would you speak with Ms. Chen?

9 MR. BENNETT: Per week, Kate?

10 BY MS. MACMULLIN:

11 Q Per week?

12 A Completely a guess, but one to two times per
13 week.

14 MR. BENNETT: Don't guess.

15 THE WITNESS: I don't remember.

16 BY MS. MACMULLIN:

17 Q During the time when you and Ms. Robinson
18 were both employed at Canal, would executive
19 assistants communicate with Mr. De Niro's former
20 partner, Toukie Smith?

21 MR. BENNETT: Objection.

22 THE WITNESS: Toukie would occasionally call
23 the office. She's not great at technology. So never
24 E-mail or text asks. She would occasionally call.

25 She lives in a building with Bob's twin

1 sons, her sons, and she's friendly.

2 BY MS. MACMULLIN:

3 Q During the time when you and Ms. Robinson
4 were both employed at Canal, would executive
5 assistants decorate for Mr. De Niro's parties?

6 MR. BENNETT: Objection.

7 MS. LAZZARO: Objection.

8 THE WITNESS: For the Christmas party that
9 year, we all helped decorate a Christmas tree, wrapped
10 the gifts going to Bob's family, and to any
11 acquaintances; mailed them out; left some in the
12 office; stuff like that. Occasionally, we'd bring in
13 balloons to the party room.

14 BY MS. MACMULLIN:

15 Q During the time when you and Ms. Robinson
16 were both employed at Canal, would executive
17 assistants make sure that Mr. De Niro's needs were
18 met?

19 MR. BENNETT: Objection.

20 THE WITNESS: Yeah, I mean, he would E-mail
21 us his asks or call, and we would handle the asks that
22 came up.

23 BY MS. MACMULLIN:

24 Q During your employment, what were the
25 working hours like for executive assistants at Canal?

1 MR. BENNETT: Objection.

2 MS. LAZZARO: Objection.

3 THE WITNESS: The working hours set by Chase
4 initially when we were both Canal employees were
5 about -- one of us would work 9:00 to 6:00. The other
6 work would 10:00 to 7:00. So that we had a longer
7 span of time collectively on the phones in the office;
8 but it certainly extends into after hours as well.

9 And we had an after-hours phone that Gillian
10 and I, as executive assistants, would work out between
11 ourselves and transfer heavily through the week.

12 Obviously, with Covid and remote work, the
13 hours have been different and on call, but not as much
14 in the office.

15 I'm now in L.A. My team hours are different
16 due to the time difference and the team I'm on.

17 It was much more desk in the office focused
18 during the time I worked with Chase. She was very
19 particular about the hours we were in the office and
20 on the phones; and would call; and check to make sure
21 I was at my desk by a certain time. It became more
22 relaxed after Chase left.

23 BY MS. MACMULLIN:

24 Q And Ms. Weeks-Brittan you testified that
25 your job title changed at a certain point. What did

1 it change to?

2 A It changed to manager of production and
3 development. I work under Berry Welsh, who is
4 president, the EVP of our production development team
5 out in L.A.

6 I still work for Canal Productions and Bob,
7 but I'm in a sort of hybrid role now doing production
8 and development work.

9 Q Is Berry Welsh an employee of Canal?

10 A No. He's an employee of Tribeca.

11 Q And are you still an employee of Canal?

12 A I'm still an employee of Canal.

13 Q Are you also an employee of
14 Tribeca Enterprises?

15 A I have a Tribeca E-mail, but my payroll is
16 through Canal.

17 Q And when did your job change to manager of
18 production and development?

19 A About a year ago when I moved to L.A.

20 Q Was becoming manager of production and
21 development a promotion for you?

22 A It was.

23 Q Did you request that promotion?

24 A I did. I was planning on moving to L.A. and
25 thought that I would need to leave the company because

1 our L.A. office is very small. And I wasn't sure if
2 there was budget here to hire.

3 I spoke with Bob a number of times about
4 ideally wanting to stay at Tribeca and being
5 interested in production and development work, not
6 knowing if there was a path or if I would need to
7 quit.

8 I gave him a heads-up and said we should
9 hire a new executive assistant. So that when I do
10 quit and/or move, you are supported. He agreed.

11 And after a couple of months of talking, I
12 spoke to Bob. I spoke to Berry. I spoke to Jane
13 Rosenthal.

14 After multiple conversations, Bob agreed
15 that it was possible to promote me and that I could
16 work on both teams, as long as I oversaw the executive
17 assistants that we hired; and just made sure that the
18 historic knowledge remained there for Canal.

19 And the executive assistants could reach out
20 to me at any time. And I would pick up the phone,
21 call them, you know, clarify anything, make sure stuff
22 was handled; but that I would effectively be on
23 Berry's team.

24 Q Who is Jane Rosenthal?

25 A She's head producer and co-CEO to Bob with

1 Tribeca.

2 Q One of your job responsibilities at Canal is
3 to supervise the executive assistants at Canal?

4 A No, it's --

5 MS. LAZZARO: Objection to form.

6 BY MS. MACMULLIN:

7 Q What, if anything, did Mr. De Niro say to
8 you about why he was granting you the promotion?

9 A We have a good working relationship. I
10 think he didn't want to lose me. I explained my
11 career goals. And it was nice and appreciated that he
12 enabled me to physically move and move up in the
13 company.

14 Q What are your career goals?

15 A Production and development work. That's
16 where my interests lay.

17 Q What is your career goal in production and
18 development?

19 A I would like to move up where possible,
20 become a producer or oversee a production and
21 development slate; generally rise in the career path
22 I'm currently on.

23 Q And apologies if I'm retreading on ground
24 that we already covered, but what are your
25 responsibilities in your job today?

1 MR. BENNETT: Objection. She has gone
2 through that, but go ahead.

3 THE WITNESS: Still the Canal Productions
4 responsibilities. I oversee two executive assistants
5 with Gabby and Francis now. I am a resource to them
6 and still occasionally on call for Bob to give them,
7 you know, time off over the holidays, stuff like that.

8 Within the Berry and Jane team, it's a lot
9 of script reading, development work, calls with
10 writers; things that are slated for the year; rereads
11 and edits; and making sure that we're able to sell and
12 pitch things mainly to Netflix.

13 BY MS. MACMULLIN:

14 Q And when you mentioned Gabby and Francis,
15 those are executive assistants to Mr. De Niro?

16 A They are.

17 Q What's Gabby's full name?

18 A Gabrielle Laurendine.

19 Q And when was Ms. Laurendine hired?

20 A She was hired last November. So I'm sorry,
21 20 -- was it 2020? Yeah, it's been -- it's just over
22 a year.

23 Q And what's Francis' full name?

24 A Francis Bogan. And he was hired November of
25 2021. So he's very new.

1 Q Which job responsibilities did you perform
2 as an executive assistant that you continue to perform
3 now that you're manager of production and development?

4 MR. BENNETT: Objection.

5 You can answer.

6 THE WITNESS: As I mentioned, like for the
7 holidays, I was on call to allow Gabby some vacation
8 time. Francis isn't fully up to speed yet since it's
9 been just over a month.

10 So I'm still performing some executive
11 assistant duties that I'm ramping down as Francis
12 ramps up, if that makes sense.

13 BY MS. MACMULLIN:

14 Q Describe for me what your compensation was
15 at Canal when you were an executive assistant.

16 MR. BENNETT: Objection.

17 THE WITNESS: Under Chase -- under Chase, I
18 was hired at [REDACTED]. I had made more in my previous
19 salary at Oracle. And I asked Chase if Canal would
20 match that. This was when she hired me. She said no
21 and that compensation is what it was.

22 After Chase left, probably a couple months
23 later, maybe around when this complaint was filed, Bob
24 asked Gillian and I, generally, like a pulse check on
25 our happiness, where we were at, kind of a check-in

1 now that we were working directly for him with no in
2 between.

3 I mentioned to Bob that I was brought in at
4 [REDACTED], but my salary was higher in my previous role. At
5 this point, I had been working for about -- over a
6 year with Bob.

7 And I told him I would definitely appreciate
8 a raise to the salary I was at before. And if he
9 thought I was doing a good job, that would very much
10 be appreciated. I was raised as a result of that
11 conversation to [REDACTED].

12 BY MS. MACMULLIN:

13 Q And what is your base salary from Canal
14 currently?

15 A [REDACTED].

16 Q Since you started working at Canal, have you
17 had any other forms of employment?

18 A Like, second jobs?

19 Q Yes.

20 A I mean, I now view my job as a second hybrid
21 on two teams as maybe I'm working on another team, but
22 not payroll-wise, I haven't worked any other job other
23 than Canal.

24 Q Since you've started working at Canal, have
25 you had any other sources of income?

1 A No.

2 Q Going back to when you were an executive
3 assistant, other than base salary, what other forms of
4 compensation and benefits did you receive from Canal?

5 A Over Christmastime, I remember Chase gave me
6 one-week bonus -- one-week salary bonus.

7 I also received some gifts from both Chase
8 and Bob over the holidays. Like, Lululemon outfits, a
9 candle, stuff like that.

10 Q Did you receive health benefits in your role
11 as an executive assistant?

12 A I did. I -- I think health benefits kicked
13 in after 90 days.

14 Q Since you started working at Canal, have you
15 had any other sources of income?

16 A I think you asked that, but no.

17 Q During the time you were an executive
18 assistant, who were the male employees at Canal?

19 A Michael Kaplan. We briefly hired a male
20 executive assistant named Ben Pitts at the start of
21 2021. He was furloughed as a result of the pandemic
22 and he was not rehired. In November, I hired Francis
23 Bogan.

24 Q What was Michael Kaplan's role when you were
25 an executive assistant?

1 MR. BENNETT: Objection.

2 You can answer.

3 THE WITNESS: I remember when Michael and
4 Chase interviewed me, and I asked their roles.
5 Michael mentioned he was some sort of like special
6 ops, kind of like made a joke.

7 He, in my mind, did tasks outside of the
8 office more. He ran a lot of errands. He worked on
9 archiving some of Bob's on set stuff, some of Bob's
10 father's stuff.

11 I don't know. He was kind of a jack of all
12 trades. He filled in where necessary. He did more of
13 the out-of-office stuff. Gillian and I stayed at our
14 desks largely.

15 BY MS. MACMULLIN:

16 Q Did Michael Kaplan have a title at Canal?

17 A He -- I think it was something like special
18 ops because I remember looking at his LinkedIn. I
19 don't remember the exact, but it was kind of like a
20 vague funny title, and he was a comedian on the side.

21 Q What kinds of errands would Michael Kaplan
22 run for Mr. De Niro?

23 MR. BENNETT: Objection.

24 You can answer.

25 MS. LAZZARO: Objection.

1 THE WITNESS: Just from, like, specific ones
2 in my knowledge, I don't know what Michael would say,
3 but he would like run to the Apple store and grab --
4 like, if we hired a new person, he'd pick stuff up.
5 He'd like run uptown to Bob's place if something
6 needed to be grabbed.

7 I know when Chase had me in the apartment a
8 little more, working in Bob's [REDACTED] place in the
9 beginning, Michael was occasionally there running
10 errands around the house; helping us as well with
11 purchases and returns; kind of bopped around.

12 He'd go to, like, the art storage facility
13 and, like, where the archiving project was. He was
14 around the city much more.

15 BY MS. MACMULLIN:

16 Q As far as you're aware, did Mr. Kaplan's job
17 responsibilities change in any way after
18 Ms. Robinson's employment ended?

19 MR. BENNETT: Objection.

20 MS. LAZZARO: Objection to form.

21 MR. BENNETT: You can answer.

22 THE WITNESS: No, not really. Gillian and I
23 took on a bit more responsibility. Michael stayed in
24 a similar archiving and running errand type of role.

25

1 BY MS. MACMULLIN:

2 Q To your knowledge, has any Canal employee
3 made a complaint about Mr. Kaplan?

4 MR. BENNETT: Objection.

5 THE WITNESS: I don't know if Chase did. I
6 don't know if that was part of her Complaint, but I
7 don't think any other Chase -- or Canal employee has.

8 BY MS. MACMULLIN:

9 Q Is Mr. Kaplan presently employed at Canal?

10 A I don't think so.

11 Q Are you aware of when he stopped being
12 employed at Canal?

13 A No, not exactly because he kind of phased
14 down his responsibilities around the time of the
15 pandemic since there was less need, one, for him to
16 be, like, physically running around the city. And I
17 think he was slowly ramping down regardless.

18 So maybe he stayed on to help with certain
19 archiving components, but it was not in a full-time
20 capacity, to my knowledge.

21 Q To your knowledge, was it Mr. Kaplan's
22 decision to phase down his responsibilities?

23 A I believe it was both his decision and Bob's
24 decision to phase him down.

25 Q During the time you were an executive

1 assistant, who were the female employees at Canal?

2 A Chase, Gillian, and now, Gabby Laurendine.

3 Q Was Robin Chambers an employee at Canal
4 during the time you were an executive assistant?

5 A I -- I don't think so, but maybe in the
6 archiving capacity that Kaplan was kept on at.

7 Q What were Gillian Spear's job
8 responsibilities during your time as an executive
9 assistant?

10 MS. LAZZARO: Objection.

11 THE WITNESS: It seemed from my perspective
12 to be similar to my job responsibilities as executive
13 assistant.

14 BY MS. MACMULLIN:

15 Q Did there come a time when Ms. Spear stopped
16 being employed at Canal?

17 A Yes, she no longer works at Canal.

18 Q Approximately when did she stop being
19 employed at Canal?

20 A She told Bob that she was planning on
21 quitting and wanted to pursue another job well before
22 she actually left. I want to say maybe November of
23 2019, she alerted him of the fact that she wanted to
24 pursue a job outside of Canal and Tribeca.

25 I think due to the pandemic and issues with

1 hiring elsewhere in general, she did stay on as his
2 executive assistant for almost a full other year
3 beyond that. So she remained an executive assistant
4 until maybe March of 2021. And then, now, she works
5 for Jon Stewart.

6 Q Are you aware of why Ms. Spear wanted to
7 leave Canal?

8 A I think she just didn't want to be an
9 executive assistant anymore. She was burned out. The
10 lifestyle, being on call is fairly draining. She
11 wanted to pursue opportunities elsewhere.

12 Q And, Ms. Weeks-Brittan, I apologize, I'm
13 forgetting whether we listed Lulu White as a female
14 employee at Canal.

15 A Oh, sorry. I forgot Lulu. I didn't list
16 her, but yeah, she was employed. She was Chase's
17 assistant maybe August of 2019 until -- 2018, I'm
18 sorry. She started about a month after I started.

19 I don't know when -- when she left Canal.
20 Maybe early months or March, April of 2020. Less than
21 a year.

22 Q Did she leave in 2019 or 2020?

23 A Sorry, sorry, sorry. She started in 2018.
24 She left in 2019 around when Chase did.

25 Q And what were Ms. White's job

1 responsibilities during your time as an executive
2 assistant?

3 A She was Chase's assistant. So I think she
4 maybe scheduled meetings for Chase, calls. She took
5 over the apartment project from me and I went back to
6 the office. I was working there with Gillian.

7 Q And to your knowledge, why did Ms. White's
8 employment at Canal end?

9 A To my knowledge, without Chase, Lulu didn't
10 have an employer directly and we didn't need an extra
11 assistant for Bob.

12 Q Did Robin -- oh, was -- sorry.

13 To rephrase my question, was Ms. White
14 terminated from Canal?

15 A I think so, but I didn't speak directly
16 to -- to her or anyone about it.

17 Q Did Robin Chambers perform work for Canal
18 during your employment?

19 MR. BENNETT: Objection.

20 You can answer.

21 THE WITNESS: Like I said, I don't know what
22 her payroll structure, if she was a Canal employee or
23 is a Canal employee; but she would do, like, one-off
24 archiving stuff with Michael Kaplan.

25 I think she lives maybe out on Long Island.

1 So she'd like come in for a project or two here and
2 there doing the archiving.

3 BY MS. MACMULLIN:

4 Q And what was your understanding of Robin
5 Chambers' role at Canal?

6 A I don't --

7 MR. BENNETT: Objection.

8 THE WITNESS: -- think she had a role at
9 Canal. I thought that she works or worked part-time
10 doing archiving with Michael Kaplan. I didn't meet
11 her until after Chase left.

12 And I want to say I had, like, maybe four or
13 five interactions with her in the three-and-a-half
14 years that I've worked here.

15 BY MS. MACMULLIN:

16 Q And what do you mean by "archiving"?

17 A Like I said, like Bob -- you know, clothes
18 that Bob gets from being on set. He keeps a lot of
19 the wardrobe. Archiving like videos and images from
20 Bob's dad's life. His dad was a painter. Artworks
21 involved.

22 As you can imagine, just a lot, a lot, a lot
23 of stuff spanning decades. So Kaplan and Robin would
24 track that and archive it, and store it somewhere.

25

1 Q To your knowledge, is Ms. Chambers still
2 performing work for Canal?

3 A I don't really know. I don't know if she
4 gets -- is paid part time or if she does one-offs; but
5 Francis Bogan is taking over archiving.

6 Q When was the last time that you've
7 interacted with Robin Chambers as part of your job?

8 A Maybe over the summer around the Tribeca
9 Film Festival when I was in New York, but I didn't see
10 her. There was just, like, a debate of if she would
11 come in and do some archiving in the city or not.

12 Q How closely did you work with Robert De Niro
13 when you were an executive assistant at Canal?

14 MR. BENNETT: Objection.

15 You can answer.

16 THE WITNESS: Closely. Definitely closer
17 after Chase left. Started a more open line of
18 communication.

19 BY MS. MACMULLIN:

20 Q How often do you interact with Robert
21 De Niro when you were an executive assistant at Canal?

22 A Almost daily. Probably daily, at least by
23 phone, and E-mail, or in person.

24 Q How often would you speak with Mr. De Niro
25 on the phone during a typical day when you were an

1 executive assistant?

2 A Did you say how many times in one day?

3 Q Yes.

4 A Definitely frequently during the work week.
5 Bob's got meetings and appointments. And he likes to
6 be like called and reminded ahead of joining a call.
7 I often would connect him to the call. So dozens of
8 times.

9 Q How often would you E-mail with Mr. De Niro
10 on a typical day when you were an executive assistant?

11 MR. BENNETT: Objection.

12 THE WITNESS: Also, a dozen times a day
13 probably. Send him, like, reminders ahead of
14 meetings, his schedule, some -- whoever's birthday it
15 was that day; little stuff like that.

16 BY MS. MACMULLIN:

17 Q How often would you text with Mr. De Niro on
18 a typical day when you were an executive assistant?

19 MR. BENNETT: Objection.

20 THE WITNESS: Very infrequently. He's
21 better, in my opinion, over the phone or in E-mail,
22 quicker to respond. He doesn't tend to read text
23 messages as frequently.

24 BY MS. MACMULLIN:

25 Q How often would you interact with

1 Mr. De Niro in person in a typical week when you were
2 an executive assistant?

3 MR. BENNETT: Objection.

4 THE WITNESS: If he was -- if he was in
5 New York, he'd often come into the office, maybe three
6 times a week or maybe two.

7 And we'd try to schedule meetings back to
8 back on those days, so that we could run through the
9 in-person stuff on the days that he physically came
10 in.

11 BY MS. MACMULLIN:

12 Q How close --

13 A (Inaudible.) Like, the year that it was the
14 pandemic, and I didn't see him or go into the office.

15 Q How closely did you work with Chase Robinson
16 when the two of you were employed at Canal?

17 A Closely. Like I said, we'd -- I'd send her
18 stuff, especially when I started and wasn't allowed on
19 the phones initially until I was ramped up.

20 So I didn't talk to Bob a lot the first
21 couple months I started. I would do what was assigned
22 to me and send stuff to Chase for approval; and then
23 send off to Bob, like, travel itineraries. I'd send
24 her a time sheet and meet -- meet my petty cash
25 expenses.

1 Q How often would you speak with Ms. Robinson
2 on the phone during a typical day when you were --
3 when the two of you were employed at Canal?

4 A Hard to say. She'd call and check in when
5 Gillian and I were in the office. And she'd maybe
6 like delegate something to us or tell us to connect
7 Bob to someone. Maybe three times a day. And we'd
8 E-mail as well.

9 Q How often would you E-mail with Ms. Robinson
10 on a typical day when the two of you were both
11 employed at Canal?

12 A Like, if she wasn't in the office, a couple
13 times a day to run things by her.

14 Q How often would you text with Ms. Robinson
15 on a typical day when the two of you were both
16 employed at Canal?

17 A I feel like we more just texted to like meet
18 up and decide on times like when I was working with
19 her in the apartment. Maybe she'd text me or I'd text
20 her, like what time tomorrow? Okay. Should we meet
21 there? Should we meet at Bloomingdale's? General
22 coordination stuff.

23 Otherwise, it was more like cc'ing on work
24 E-mails and stuff for visibility.

25 Q And how often would you interact with

1 Ms. Robinson in person in a typical week when the two
2 of you were both employed at Canal?

3 A It definitely ebbed and flowed. More
4 frequently in person when I was helping her with the
5 apartment since I'd be physically there with her.
6 Less frequently once Lulu started.

7 Chase and Lulu would not be in the office as
8 much. Gillian and I were kind of the ones holding
9 down the fort there. Kap with Bob between.

10 Q On what subjects would you interact with
11 Ms. Robinson when the two of you were employed at
12 Canal?

13 MR. BENNETT: Objection.

14 MS. LAZZARO: Objection to form.

15 THE WITNESS: Can I answer?

16 MR. BENNETT: Yes. Sorry. Yes.

17 THE WITNESS: Time sheets, petty cash,
18 sending her stuff for approval; confirming that we
19 scheduled calls that she had called us about to make
20 sure we set.

21 General just like checking that everything
22 is being handled by the executive assistants in that
23 capacity.

24 BY MS. MACMULLIN:

25 Q On what tasks for Mr. De Niro would you

1 interact with Ms. Robinson when the two of you were
2 employed at Canal?

3 MS. LAZZARO: Objection to form.

4 MR. BENNETT: Objection.

5 You can answer. You can answer.

6 THE WITNESS: Same kind of stuff. Like
7 the -- the travel itinerary, going back to, was the
8 most kind of applicable to the both, fairly detailed.

9 Like, we put the departure time, passengers,
10 weather in the area he was going; hotels; restaurants
11 in the area he was going.

12 Chase sent me a bunch of template examples
13 that I could build off those when I started because I
14 hadn't done travel things before in my other job.

15 Any like -- anything that came up. If he
16 needed to speak to his agent or his publicist or Chase
17 met with him or talked to him about something; maybe
18 she'd send or call Gillian and myself and say, okay,
19 Bob's gotta do this, this, and this.

20 Or reminder, the film festival is coming up.
21 We need to make we're in touch with the festival
22 people. I'll go -- Chase would, like, go over the
23 festival list with Bob and his asks; and just general
24 things, like reminders for Bob.

25

1 BY MS. MACMULLIN:

2 Q Would Ms. Robinson convey messages to you
3 from Mr. De Niro?

4 MR. BENNETT: Objection.

5 You can answer.

6 THE WITNESS: Yeah, like, if she was
7 physically with him or if they spoke, but it was
8 something that was more, like, in our purview as
9 assistants, then she'd send us or call us and tell us,
10 you know, do this; make sure you're scheduling this
11 appointment a few months out. Make sure, like, this
12 is top of mind. She'd put it on the reminders or the
13 call lists, stuff like that.

14 BY MS. MACMULLIN:

15 Q Would Ms. Robinson convey assignments from
16 Mr. De Niro to you?

17 MR. BENNETT: Objection.

18 THE WITNESS: Yes.

19 MR. BENNETT: You can answer.

20 THE WITNESS: His travel itinerary.

21 BY MS. MACMULLIN:

22 Q Would Ms. Robinson convey times that you
23 needed to be available to answer calls for
24 Mr. De Niro?

25 A Yes. It was an on-call job. So if I was on

1 call, Chase would ensure that I was actually on call
2 and that my phone was on loud.

3 And sometimes she'd call and check in the
4 morning to make sure earlier when I was ramping up,
5 hey, are you on call? Hey, are you in the office?

6 She was more strict on where we physically
7 were in answering the phones than Bob himself.

8 Q Would Ms. Robinson convey Mr. De Niro's
9 priorities to you?

10 MS. LAZZARO: Objection.

11 THE WITNESS: Kind of hard to say because he
12 and Chase were all sort of in the mindset of like
13 everything's priority. Like, it all gets handled.
14 Nothing should slip through the cracks.

15 Obviously, if he needed to call someone
16 important that day, she would certainly say, like,
17 make sure he gets Josh today, something like that.

18 BY MS. MACMULLIN:

19 Q Would Ms. Robinson convey Mr. De Niro's
20 feedback on tasks to you?

21 A Not really. Or I don't recall, but --

22 Q Did Ms. -- did you observe all of the job
23 responsibilities that Ms. Robinson performed for
24 Mr. De Niro?

25 MR. BENNETT: Objection.

1 THE WITNESS: No, because she wasn't in the
2 office as much as Gillian and me, so I didn't have
3 visibility.

4 BY MS. MACMULLIN:

5 Q During the time when you were both employed
6 at Canal, what was Chase Robinson's role at Canal?

7 A VP of Finance and Production.

8 Q During the time when you were both employed
9 at Canal, what were Chase Robinson's job
10 responsibilities at Canal?

11 A I viewed her as a manager. Someone that I
12 would submit stuff to and make sure it was okay before
13 sending off to Bob, who I viewed as our overall
14 manager.

15 She, obviously, had a lot of historic
16 knowledge, such a long working relationship with Bob.
17 So I viewed her as a resource in that capacity.

18 I couldn't tell what she was handling like
19 from a production standpoint because I wasn't really
20 cc'ed on those E-mails largely. So I wasn't quite
21 sure.

22 Finance stuff, like I said, I'd submit petty
23 cash and expenses to her. She'd approve and forward
24 on my timecard. She approved my vacation time and
25 stuff like that.

1 Q During the time when you were both employed
2 at Canal, what job duties did you observe Chase
3 Robinson perform?

4 A Phone calls. General maybe production
5 stuff. But like I said, I didn't really see that.
6 She took over the apartment project. I think she was
7 busy with that a lot of the early months that I was
8 hired. She did a lot of the Christmas shopping,
9 bought toys and stuff for, like, the holiday drive at
10 Tribeca.

11 Q Anything else?

12 A Generally, like calls and meetings, setting
13 stuff like that; but I didn't always have oversight
14 into that. Like, Gillian and I would cc her.

15 But other maybe higher level stuff or stuff
16 that she didn't want us to have visibility into, she
17 wouldn't cc us. So I just saw less.

18 Q During the time when you were both employed
19 at Canal, was one of Ms. Robinson's job
20 responsibilities facilitating Mr. De Niro's travel?

21 MR. BENNETT: Objection.

22 You can answer.

23 THE WITNESS: I would say she oversaw the
24 facilitating of it. Gillian and I would E-mail either
25 the travel agents for commercial travel or our charter

1 contact for private air travel. Like I said, I'd send
2 her the travel itineraries I made. Gillian would send
3 her the travel itineraries she made.

4 She'd approve those and be cc'ed on E-mails
5 of the actual day of the flight. Gillian or I would
6 be on call the day of the flight. We'd check in with
7 the pilot, check in with the driver, make sure it was
8 seamless; and we'd cc Chase for oversight.

9 BY MS. MACMULLIN:

10 Q During the time when you were both employed
11 at Canal, one of Ms. Robinson's job responsibilities
12 was overseeing the scheduling of Mr. De Niro's travel;
13 correct?

14 MR. BENNETT: Objection.

15 THE WITNESS: Yes. Directly, she'd -- she
16 generally oversaw a lot of what we did and made sure
17 it was a smooth-running office.

18 BY MS. MACMULLIN:

19 Q During the time when you were both employed
20 at Canal, was one of Ms. Robinson's job
21 responsibilities scheduling appointments for
22 Mr. De Niro?

23 A I'm sure she did schedule appointments, but
24 I didn't necessarily see that. Like I said, I would
25 cc her, but she wouldn't always cc us.

1 Q During the time when you were both employed
2 at Canal, was one of Ms. Robinson's job
3 responsibilities scheduling calls for Mr. De Niro?

4 A I guess, yeah, like if he -- if he needed to
5 take the calls of his entertainment lawyer, she would
6 on occasion remind us to make sure he called that
7 person.

8 She would often just loop me and Gillian in,
9 though, if it wasn't someone super important. And
10 she'd say, the girls will handle. And then, she'd
11 plus us in and then we'd schedule a call. So she
12 would, I would say, delegate to us on occasion, but
13 maybe schedule her own as well.

14 Q Was one of Ms. Robinson's job
15 responsibilities scheduling meetings for Mr. De Niro?

16 A Same thing. She'd plus us in if we were to
17 schedule them. Otherwise, we wouldn't have visibility
18 and be watching.

19 Q Was one of Ms. Robinson's job
20 responsibilities responding to E-mails directed to
21 Mr. De Niro?

22 A I guess, but I don't have a lot of
23 visibility. I didn't see a ton of E-mails that she
24 sent.

25 Q Ms. Robinson would oversee the scheduling of

1 meetings or she would schedule them herself?

2 A Very dependent on the meeting. I don't know
3 how to -- like, there's a hierarchy.

4 She would respond to her own stuff or to
5 Bob's meetings that were of a level of importance or
6 perceived importance. She'd add Gillian and me in to
7 schedule other things.

8 Q Was one of Ms. Robinson's job
9 responsibilities running errands for Mr. De Niro?

10 MR. BENNETT: Objection.

11 You can answer.

12 THE WITNESS: I guess, but I believed Kap
13 was more of an errand person. And Chase would
14 definitely -- she definitely shopped for the apartment
15 project, but that seemed more like project based and
16 less errand based.

17 Kap would kind of run around the city more
18 for like pick-ups and printing photos, and random
19 errands like that.

20 BY MS. MACMULLIN:

21 Q So one of Ms. Robinson's job
22 responsibilities was shopping for Bob's apartment?

23 MR. BENNETT: Objection.

24 MS. LAZZARO: Objection.

25 THE WITNESS: It's just hard for me to

1 answer these because even when I was hired, the job
2 responsibilities were not provided clearly like this
3 because there's just like a level of vague uncertainty
4 in things that come up.

5 So that's why I said when she hired me, she
6 said, anything that I ask you or Bob asks you is
7 pretty much in the purview of your job.

8 So I imagine Chase had similarly vague job
9 responsibilities that involved a number of things as
10 they came up.

11 BY MS. MACMULLIN:

12 Q Your understanding is that Ms. Robinson's
13 job responsibilities were not defined; is that
14 correct?

15 A Correct.

16 MR. BENNETT: Object.

17 BY MS. MACMULLIN:

18 Q Was one of Ms. Robinson's job
19 responsibilities making reservations for Mr. De Niro?

20 A I don't think so, but maybe if it came up or
21 if he directly asked her and she did something that I
22 was not part of on the E-mail chain; or on the call,
23 then maybe she did; but I don't know.

24 Q Was one of Ms. Robinson's job
25 responsibilities assisting Mr. De Niro in selecting

1 birthday gifts?

2 MR. BENNETT: Objection.

3 THE WITNESS: She definitely took gifts and
4 holiday stuff like under her wing, and had a hand in
5 the decision-making process; or would make suggestions
6 to Bob on what he -- she felt he should get for
7 certain people.

8 BY MS. MACMULLIN:

9 Q Did Mr. De Niro solicit her input on what to
10 get as gifts for specific people?

11 MS. LAZZARO: Objection.

12 THE WITNESS: My understanding, at the time,
13 I felt she was more inserting her opinion on input.
14 I -- I have no firsthand knowledge of him asking her
15 or her asking him for -- I -- I don't know.

16 BY MS. MACMULLIN:

17 Q Was one of Ms. Robinson's job
18 responsibilities assisting with Mr. De Niro's home at
19 [REDACTED]

20 A When I started on that project, I similarly
21 felt that she voluntarily involved herself and enjoyed
22 and took over some of the design components of the
23 house. And she personally brought me into that
24 project.

25 Q Was one of Ms. Robinson's job

1 responsibilities assisting with Mr. De Niro's home at
2 [REDACTED]

3 MR. BENNETT: Objection.

4 THE WITNESS: I -- I don't have firsthand
5 knowledge if that was a job responsibility or if that
6 was a project that Chase took on. I don't think the
7 job responsibilities for her were spelled out. I
8 don't know.

9 BY MS. MACMULLIN:

10 Q But the two of you performed work together
11 at the [REDACTED] home; is that correct?

12 A Yes. Chase involved me in that.

13 Q Was one of Ms. Robinson's job
14 responsibilities communicating with Mr. De Niro's
15 girlfriend, Tiffany Chen?

16 A I have no firsthand knowledge of that.
17 Because, like I mentioned, I didn't know or meet
18 Tiffany Chen until I want to say, maybe March. Maybe
19 February of 2019.

20 So I had not met Tiffany in person until
21 after Chase left. I don't know what directives she
22 may have given.

23 Q Was one of Ms. Robinson's job
24 responsibilities communicating with Mr. De Niro's
25 children?

1 A I don't know if it was a job responsibility
2 or something that just came up when you work for
3 someone who has a large life both professionally and
4 personally.

5 I know she had conversations with Bob's
6 kids, as did I, as did Gillian. I don't know beyond
7 that.

8 Q Was one of Ms. Robinson's job
9 responsibilities communicating with Mr. De Niro's
10 former partner, Toukie Smith?

11 A Yes. I don't know if it was a job
12 responsibility, but I know Chase did help Toukie. And
13 financially, she did involve cash if Toukie needed
14 some things. Toukie has [REDACTED] and requires a bit more
15 care and oversight.

16 Q Was one of Ms. Robinson's job
17 responsibilities decorating for Mr. De Niro's parties?

18 A For his what?

19 MS. LAZZARO: Objection.

20 BY MS. MACMULLIN:

21 Q Decorating for Mr. De Niro's parties.

22 A I don't think it was a job responsibility.
23 She didn't come to the holiday party.

24 I know she did decorate the Christmas tree
25 in his office that year of Christmas. I don't know if

1 it was a responsibility or not.

2 Q Was one of Ms. Robinson's job
3 responsibilities making sure that Mr. De Niro's needs
4 were met?

5 MR. BENNETT: Objection.

6 THE WITNESS: I guess, yes.

7 BY MS. MACMULLIN:

8 Q Working for Mr. De Niro is not a nine to
9 five job; is it?

10 MS. LAZZARO: Objection.

11 THE WITNESS: Correct.

12 BY MS. MACMULLIN:

13 Q I'm sorry. I didn't hear your answer.

14 A Correct. The executive assistants are
15 expected to be on call beyond standard work hours.

16 Q Which employees did Mr. De Niro expect would
17 be available to him beyond standard work hours?

18 MR. BENNETT: Just to clarify, can you
19 specify a time period?

20 MS. MACMULLIN: Sure.

21 BY MS. MACMULLIN:

22 Q During the time that you were an executive
23 assistant, which employees did Mr. De Niro -- excuse
24 me, expect would be available to him beyond standard
25 work hours?

1 MR. BENNETT: Objection.

2 THE WITNESS: At the bare minimum, at least
3 whichever executive assistant was on call. Gillian
4 and I would alternate.

5 So, let's say, I was off that weekend, he
6 wouldn't expect me to be on call if Gillian was on
7 call. He'd expect to reach one of us. I guess that
8 he did expect to reach Chase, but I don't know what
9 they discussed about when she was not on call; but
10 when she was expected to answer her phone and when she
11 wasn't, I'm -- I'm not sure.

12 He'd expect to call Kaplan, but would not
13 get Kaplan as much because he was a little less
14 responsible with his phone. I don't know.

15 BY MS. MACMULLIN:

16 Q What did it mean for an executive assistant
17 to be on call?

18 A When I worked with Chase, we had physical
19 after-hours phone. It was a different phone number
20 that Gillian and I would physically pass between us.
21 And that phone was always on loud. And if Bob called
22 or if Chase called, we answered.

23 Q And what were the job responsibilities for
24 an executive assistant who was on call?

25 MS. LAZZARO: Object.

1 MR. BENNETT: Objection.

2 You can answer.

3 THE WITNESS: The same as normal
4 responsibilities if something happened after hours.
5 So if something was messed up with the flight or there
6 was a big delay, and whoever was on call would handle
7 weekend stuff and after-hours stuff.

8 BY MS. MACMULLIN:

9 Q It was a common occurrence that work would
10 have to be performed for Mr. De Niro in the evenings;
11 is that correct?

12 MR. BENNETT: Objection.

13 You can answer.

14 THE WITNESS: If on call, yes.

15 BY MS. MACMULLIN:

16 Q And you performed work for Mr. De Niro in
17 the evenings when you were on call; is that correct?

18 A When I was on call, as -- as work came up,
19 yes. Not necessarily always. If there was something
20 to do, yes.

21 Q Did you always receive overtime pay for the
22 work that you performed for Mr. De Niro in the
23 evenings?

24 A Yes, I submitted my time sheets to Chase
25 when I had overtime. And she would approve them and

1 send them to, I believe, Michael Tasch.

2 Q Ms. Robinson performed work for Mr. De Niro
3 in the evenings during the time that you were both
4 employed at Canal; correct?

5 MS. LAZZARO: Objection.

6 THE WITNESS: On occasion, I believe so.

7 BY MS. MACMULLIN:

8 Q It was a common occurrence that work would
9 have to be performed for Mr. De Niro during weekends;
10 is that correct?

11 MR. BENNETT: Objection.

12 You can answer.

13 MS. LAZZARO: Object.

14 THE WITNESS: For the after-hours person
15 when work arose, then yes.

16 BY MS. MACMULLIN:

17 Q And you performed work for Mr. De Niro
18 during weekends; is that correct?

19 A When on call, if something came up, yes.

20 Q Did you always receive overtime pay for the
21 work you performed for Mr. De Niro during weekends?

22 A I think you just asked me that.

23 Q My prior question was about work during the
24 evenings and this is about during weekends.

25 A Oh. If and when I had overtime, I added it

1 to my time sheet for the week, sent it to Chase. And
2 it was approved and then I was paid overtime.

3 Q And Ms. Robinson performed work for
4 Mr. De Niro during weekends; is that correct?

5 MS. LAZZARO: Objection.

6 THE WITNESS: On occasion, I would guess so,
7 yes.

8 BY MS. MACMULLIN:

9 Q Was there an expectation that Ms. Robinson
10 would be available to Mr. De Niro around the clock?

11 MR. BENNETT: Objection.

12 THE WITNESS: I don't know what the two of
13 them discussed as being expectations. Chase to us as
14 an -- like, to the executive assistants, would be
15 reachable if something came up and I'd ask her. She
16 was often on her work phone.

17 BY MS. MACMULLIN:

18 Q To your knowledge, was Ms. Robinson
19 generally available to Mr. De Niro?

20 A I think so, yeah.

21 Q Was there ever a concern at Canal about
22 paying any employees overtime?

23 MR. BENNETT: Objection.

24 MS. LAZZARO: Objection.

25 MR. BENNETT: Concern by Ms. Week --

1 Weeks-Brittan or someone else?

2 BY MS. MACMULLIN:

3 Q To your knowledge, was there ever a concern
4 at Canal about paying employees overtime?

5 A Not until I became aware this -- that Chase
6 felt she had overtime. I believed that Chase was
7 overtime exempt when she was at Canal. So I wasn't
8 aware.

9 That was, going back to the beginning, a
10 surprise of this case.

11 Q Are you aware of any Canal employee not
12 billing overtime for hours during which he or she
13 would be entitled to overtime pay?

14 MR. BENNETT: Objection.

15 You can answer.

16 THE WITNESS: I think that if someone was to
17 get overtime, like the executive assistants who
18 received overtime, we would submit the time sheets to
19 Chase; and then we'd receive overtime.

20 Gillian and I didn't complain to one another
21 about not getting paid overtime when due.

22 BY MS. MACMULLIN:

23 Q Did Mr. De Niro ever express any concern
24 about paying employees overtime?

25 MS. LAZZARO: Objection.

1 THE WITNESS: Not to me. I don't have
2 knowledge of that.

3 BY MS. MACMULLIN:

4 Q Are you aware of Mr. De Niro expressing any
5 concerns about paying employees overtime?

6 MR. BENNETT: Objection.

7 MS. LAZZARO: Objection.

8 MR. BENNETT: To the extent that any
9 information that you might provide in response to that
10 question comes from legal counsel for Canal, I'm going
11 to direct you not to answer. Otherwise, you can
12 answer the question.

13 THE WITNESS: Not to my knowledge. Like I
14 said, if I had overtime, I submitted it to Chase and
15 it was general -- generally approved and paid out. So
16 I had no complaints there.

17 BY MS. MACMULLIN:

18 Q Mr. De Niro's needs changed from time to
19 time; is that correct?

20 MS. LAZZARO: Object.

21 MR. BENNETT: Objection.

22 THE WITNESS: I feel like any -- any
23 person's needs change day to day, time to time.

24 BY MS. MACMULLIN:

25 Q And employees' responsibilities at Canal

1 would shift to ensure that Mr. De Niro's needs were
2 met; correct?

3 MR. BENNETT: Objection.

4 MS. LAZZARO: Objection.

5 MR. BENNETT: You can answer.

6 THE WITNESS: Yeah, like the -- as vague as
7 the responsibilities of my job were, it was to predict
8 and address needs, and issues, or expectations as they
9 popped up.

10 BY MS. MACMULLIN:

11 Q In late 2018 and early 2019, one important
12 need for Mr. De Niro was dealing with his divorce from
13 Grace Hightower De Niro; is that correct?

14 A Correct.

15 MR. BENNETT: Objection.

16 BY MS. MACMULLIN:

17 Q What work did Ms. Robinson perform in
18 connection with Mr. De Niro's divorce?

19 MS. LAZZARO: Objection.

20 THE WITNESS: I remembered the time we
21 were making sure that the calendar was very updated to
22 show specific pick-up and drop-off times with his kids
23 and weekend time spent with them.

24 You know, Chase asked us to make sure we
25 were tracking that very precisely.

1 I think she also pulled those dates from the
2 calendar. So there was a clear record of like
3 after-school activities he was going to do with them,
4 days that he was with them, and what they did. That
5 was very precisely recorded by the office.

6 BY MS. MACMULLIN:

7 Q And who was working on this project?

8 A Gillian, me, and Chase.

9 Q To your knowledge, was dealing with
10 Mr. De Niro's divorce a substantial part of
11 Ms. Robinson's job from late 2018 to early 2019?

12 MR. BENNETT: Objection.

13 MS. LAZZARO: Object.

14 THE WITNESS: I have no way to know if it
15 was a substantial part of what she was doing
16 day-to-day. It was part of what she was doing.

17 BY MS. MACMULLIN:

18 Q In late 2018 and early 2019, one important
19 need for Mr. De Niro was setting up his new home at
20 [REDACTED]; correct?

21 MR. BENNETT: Objection.

22 You can answer.

23 THE WITNESS: Yes, the apartment project
24 that I was brought into and then Lulu was brought into
25 with Chase.

1 BY MS. MACMULLIN:

2 Q What work did Ms. Robinson perform in
3 connection with setting up Mr. De Niro's new home?

4 MR. BENNETT: Objection. Beyond what she's
5 already testified to?

6 BY MS. MACMULLIN:

7 Q Please answer my question.

8 A Shopping. We'd go to Bloomingdale's
9 together. We'd go to Sur La Table shopping for things
10 for the home.

11 Like I said, I'd like helped out, furniture
12 dimensions, and she'd move them around the living
13 room. She brought in, like, a friend designer, pretty
14 much when I was ramping down because Lulu came on.

15 And then I went to the office. I think the
16 person's name was Rachel. Yeah, a lot of shopping and
17 making sure the house was filled.

18 Q To your knowledge, was helping Mr. De Niro
19 set up his new home at [REDACTED]

20 [REDACTED] a substantial part of Ms. Robinson's job from
21 late 2018 to early 2019?

22 MR. BENNETT: Objection.

23 MS. LAZZARO: Objection.

24 THE WITNESS: It definitely appeared like
25 she was very busy with the home project, but like I

1 said, I don't know if that was an expectation of her
2 or if she took that on.

3 BY MS. MACMULLIN:

4 Q Did you review a draft recommendation letter
5 that Ms. Robinson drafted for Mr. De Niro to review?

6 A A what? Can you repeat that?

7 Q Did you review a draft recommendation letter
8 that Ms. Robinson drafted for Mr. De Niro to review?

9 A Like, a recommendation for Chase?

10 Q Yes.

11 A I do think I've seen it. I didn't review it
12 and Bob didn't show it to me. We didn't discuss that,
13 but I do feel like that rings a bell.

14 Q We're going to share in the chat a document
15 that's been Bates stamped ROBINSON0001662. And once
16 you see it in the chat, Ms. Weeks-Brittan, you can
17 open it.

18 A Okay.

19 THE REPORTER: Are you marking this as an
20 exhibit?

21 MS. MACMULLIN: Yes. Thank you. I'm
22 marking it as Plaintiff's Exhibit 1.

23 THE WITNESS: I see it here. I'm reading
24 it.

25

1 (Whereupon, Exhibit 1 is marked for
2 identification and is attached
3 hereto.)

4 BY MS. MACMULLIN:

5 Q Okay.

6 A Just to clarify, it's like marked on Canal
7 letterhead, but it was written by Chase; right?

8 You're not saying to me that Bob wrote that;
9 right?

10 MR. BENNETT: No -- no question pending,
11 Sabrina. Just wait for the -- for a question.

12 THE WITNESS: Oh, okay. Yeah, I read it.

13 BY MS. MACMULLIN:

14 Q Okay. Do you recognize this document?

15 A Yeah, I think I saw it at the time, but not
16 from Bob.

17 Q Do you recall --

18 A And not from Chase.

19 Q Do you recall that this was a draft
20 recommendation letter that Ms. Robinson drafted for
21 Mr. De Niro to review?

22 A I'm pretty sure I saw it after the fact, but
23 I -- yeah, I recall it around the time of Chase's
24 exit.

25 Q Who showed it to you?

1 A I don't know. Definitely sent maybe
2 internally or -- I don't know. Maybe Gillian. I
3 don't know.

4 There was quite a lot of just, like, gossip
5 and random fallout of the Chase exit. It definitely
6 got to me, but I don't know how.

7 Q Did you discuss this draft recommendation
8 letter with anyone at Canal?

9 A If anyone, Gillian, but I don't remember
10 specifics.

11 Q On how many occasions did you discuss it
12 with Gillian?

13 A I don't know. Maybe like one occasion where
14 we both looked at it and then immediately talked.

15 Q Did you discuss it with Mr. De Niro?

16 A No.

17 Q Did you discuss it with Tiffany Chen?

18 A Maybe. She may have discussed it with me,
19 but I -- I don't really remember.

20 Q What do you recall Ms. Chen saying, if
21 anything, during that discussion?

22 A It's just hard to pinpoint if I spoke to her
23 or if I heard stuff through the grapevine. I vaguely
24 remember that she found it a little ridiculous, but I
25 don't know if I was directly talking to her or if it

1 was just kind of gossipy around the office.

2 Q What aspects of the letter did Ms. Chen
3 characterize as ridiculous?

4 A I just don't --

5 MS. LAZZARO: Objection.

6 THE WITNESS: I don't -- I don't know. I
7 mean, my general sense at the time, I felt Chase left
8 on bad terms and there was some evidence of petty cash
9 theft, time theft.

10 It seemed like asking for a letter of
11 recommendation after the fallout of what I viewed as a
12 bad exit was ill timed. So to speak so highly of
13 their relationship when there was a lot of just, like,
14 financial things that were viewed as incorrect, people
15 generally said was ridiculous. I -- maybe one of
16 those people was Tiffany.

17 Q And what financial things were viewed as
18 incorrect?

19 A I think it came to light after Chase left,
20 but it seems to me like she used the corporate card a
21 lot for personal meals, for vacation trips. She
22 purchased a lot of stuff for that house project.

23 I think there was a lot of shopping and a
24 lot of excess in the office in general. A lot of that
25 stuff was kept at Chase's house, like gift cards,

1 things for Bob's home project.

2 It came to light to me afterwards, in trying
3 to review Chase's E-mails to make sure the office was
4 running properly, that she claimed she used zero
5 vacation days during the year and got reimbursed for
6 those when I have a bunch of E-mails with Chase or
7 Chase to Bob E-mails requesting vacation days.

8 She would turn down vacation day requests
9 for me and Gillian, and went to Spain, and London
10 during her time. I viewed those as vacations. So
11 certain things that seemed like they didn't line up.

12 Q Did you discuss this draft recommendation
13 letter with Tom Harvey?

14 A I have no idea. I don't think so because
15 Tom and I usually just discussed things that pertain
16 to us or if he needs to connect to Bob.

17 Q Is there anything that Ms. Robinson
18 describes in the draft recommendation letter that you
19 believe was not a part of her job responsibilities
20 when the two of you worked at Canal?

21 MR. BENNETT: Sabrina, review the letter.

22 THE WITNESS: Yeah, I'm going to look back
23 at it now.

24 Can you reask the question now that I've
25 read it?

1 MS. MACMULLIN: Could the court reporter
2 read my question back?

3 (Whereupon, the question was read
4 back as follows:

5 "Q Is there anything that
6 Ms. Robinson describes in the draft
7 recommendation letter that you
8 believe was not a part of her job
9 responsibilities when the two of
10 you worked in Canal?")

11 THE WITNESS: The bettering of morale for
12 the employees at Canal is comical because morale was
13 extremely low when we worked for Chase and has been
14 much higher since.

15 Other than that, I think that everything
16 else she did do at some level, but it's embellished a
17 bit making it seem like she did more important things.

18 BY MS. MACMULLIN:

19 Q In what regard do you believe that the
20 letter makes it appear that Ms. Robinson's job
21 responsibilities were more important than they really
22 were?

23 MR. BENNETT: Objection.

24 You can answer.

25 THE WITNESS: That's not what I was saying

1 or what I meant. I just think that the way she worded
2 certain things is an exaggerated way to word stuff
3 that she did do.

4 Like, let's see, Chase was able to identify
5 areas of vulnerability and implement new systems not
6 only for financial matters, but in the areas of
7 compliance and employee benefits.

8 Like I just think that's an exaggerated way
9 of saying she tracked our petty cash and submitted our
10 time cards.

11 The morale -- let's see.

12 "The result was seen in the
13 restructured system in the morale
14 of the employees that worked so
15 hard for me."

16 That I feel is a lie.

17 Wherever it said production stuff. Yeah, I
18 just -- I mean, when I came on and was hired, and
19 Chase said she was VP of Finance and Production, I
20 definitely thought she had more of a hand in
21 production -- actual production work versus like
22 talking to producers, and lawyers to set Bob's
23 schedule or his contract.

24 She wasn't doing production work on script
25 reading or developing projects. That -- that stuff

1 falls really under Jane and Berry; but I just feel
2 that there were some exaggerations made in that; but
3 that she touched on the things that she mentioned.

4 BY MS. MACMULLIN:

5 Q Were there any other job duties that
6 Ms. Robinson included in the draft recommendation
7 letter that you did not observe her performing?

8 MR. BENNETT: Objection.

9 You can answer.

10 THE WITNESS: I mean, I didn't observe her
11 implement a new system for financial matters. I -- I
12 did observe her working with lawyers and agents on
13 deals and contracts.

14 Yeah, I mean, I observed her advise on
15 certain things, including a nonprofit like TFI.

16 "Her ability to see the big picture
17 has moved my company in a better
18 direction," I did not observe.

19 I think we were in a very bad place because
20 of her and have since moved in a better direction.

21 Yeah, it's just exaggerated. Like, I don't
22 think she was an invaluable asset because no one was
23 hired to replace her. We took over general
24 responsibilities. That I do some of the stuff that's
25 spelled out in that, but not to the exaggerated

1 effect.

2 BY MS. MACMULLIN:

3 Q Is there anything else in the draft
4 recommendation letter that you disagree with?

5 A I think I spelled out most of my
6 disagreements. Her leadership and how she managed a
7 team, I very much disagree with that.

8 Q Anything else?

9 A I think I mentioned everything.

10 Q During your employment, what role has
11 Michael Tasch played at Canal?

12 A Accountant to Canal.

13 Q Has Michael Tasch been a financial advisor
14 for Canal?

15 MR. BENNETT: Objection.

16 You can answer.

17 THE WITNESS: I don't know what he's advised
18 or not. I know he's our accountant. I haven't had
19 financial advising meetings with him.

20 BY MS. MACMULLIN:

21 Q What are his responsibilities as Canal's
22 accountant?

23 MS. LAZZARO: Objection.

24 THE WITNESS: To be our accountant, to set
25 up payroll for new employees, be Bob's accountant. I

1 don't -- I don't have a ton of visibility into the
2 nitty gritty of the accountant job.

3 BY MS. MACMULLIN:

4 Q Has Michael Tasch overseen Canal's financial
5 affairs?

6 A He collected our timecards and petty cash
7 expenses.

8 Q Has Michael Tasch received the bills for
9 Canal?

10 MS. LAZZARO: Objection.

11 THE WITNESS: Yeah.

12 MR. BENNETT: Objection.

13 THE WITNESS: Some bills went straight to
14 Berdon. Some bills went to Canal or to Chase, and
15 then, sometimes we would send him the bills from
16 there.

17 BY MS. MACMULLIN:

18 Q Is it correct that bills that went directly
19 to Canal were remitted to Berdon?

20 MR. BENNETT: I would just add to you that,
21 again, I think we're encroaching on the 30(b)(6)
22 issue. This witness is here to testify about personal
23 knowledge. So if she can rephrase the question to
24 inquire as to the -- her personal knowledge, then
25 that's fine.

1 But, otherwise, I think we're -- we're
2 getting hanged up on the 30(b)(6).

3 BY MS. MACMULLIN:

4 Q Ms. Weeks-Brittan, you can please answer the
5 question.

6 A Can you repeat it?

7 MS. MACMULLIN: Can the court reporter
8 please read my question back?

9 (Whereupon, the question was read
10 back as follows:

11 "Q Is it correct that bills that
12 went directly to Canal were
13 remitted to Berdon?")

14 MR. BENNETT: Same objection.

15 You can answer.

16 THE WITNESS: I can't say if that's
17 100 percent correct. I would say I have sent bills
18 that we had received to Berdon. There were separate
19 bills under Chase's name. I don't know where those
20 went.

21 BY MS. MACMULLIN:

22 Q Has Michael Tasch --

23 MR. BENNETT: Sorry to interrupt.

24 Whenever -- whenever there's an opportunity
25 on your end -- I don't mean to interrupt your line of

1 questioning. If we could take a brief restroom break,
2 I would appreciate it.

3 MS. MACMULLIN: Absolutely. Yeah, I think
4 we're coming up on a good place for a break in just a
5 little bit.

6 BY MS. MACMULLIN:

7 Q Has Michael Tasch received credit card
8 statements for Canal?

9 A Yes. To my knowledge, yes.

10 Q Has Michael Tasch been a resource for Canal
11 employees?

12 MS. LAZZARO: Objection.

13 MR. BENNETT: Objection. Same -- the same
14 30(b)(6) issue we're encroaching on.

15 Go ahead.

16 THE WITNESS: To me, he has been a resource
17 when it came to hiring new assistants for the office.
18 I've had direct conversations with him about that and
19 compensation.

20 BY MS. MACMULLIN:

21 Q On what types of matters would employees go
22 to Michael Tasch for guidance?

23 MS. LAZZARO: Objection.

24 MR. BENNETT: Objection. Same 30(b)(6)
25 issue.

1 THE WITNESS: I would go to Michael Tasch
2 for guidance and did go to him when I mentioned I got
3 a raise after Chase left. I spoke to Bob about it.
4 Bob told me to speak to Michael Tasch about it.

5 I had a conversation with Michael Tasch and
6 Bosswick. Matters like that are why I would go to
7 Tasch.

8 BY MS. MACMULLIN:

9 Q Based on your observation, how often would
10 personnel at Canal interact with Michael Tasch during
11 a typical week?

12 MR. BENNETT: Objection.

13 THE WITNESS: I interact with Michael Tasch
14 in relation to Bob a fair amount, too. Bob will speak
15 with Tasch maybe once a week. Maybe Tasch will need
16 something signed and we'll speak about that. And I'll
17 print it and have Bob sign it.

18 Personally, I go to Tasch when I have
19 questions about financial stuff in relation to myself
20 and my job.

21 BY MS. MACMULLIN:

22 Q Are you aware of Michael Tasch ever
23 providing direction to Ms. Robinson?

24 MS. LAZZARO: Objection.

25 THE WITNESS: I was never privy. I didn't

1 witness their direct conversations. I didn't hear
2 them. I know Chase spoke with him, but I don't know
3 what was discussed.

4 BY MS. MACMULLIN:

5 Q During your employment, what role has Mark
6 Bosswick played at Canal?

7 MR. BENNETT: Objection.

8 THE WITNESS: I speak with --

9 MR. BENNETT: You can answer.

10 THE WITNESS: Speak with him much less
11 frequently than Tasch. But as I mentioned, I did talk
12 to both him and Tasch when I asked for a raise.

13 Occasionally, Bob will speak to him in --
14 in -- to my knowledge, less frequently than Bob speaks
15 to Tasch; less frequently than I speak to Tasch; but
16 he is also around.

17 BY MS. MACMULLIN:

18 Q And what role does Mark Bosswick play at
19 Canal?

20 MR. BENNETT: Same objection about the
21 30(b)(6).

22 You can answer.

23 THE WITNESS: I think he's also an
24 accountant.

25

1 BY MS. MACMULLIN:

2 Q Can you explain the difference between the
3 role performed by Michael Tasch versus Mark Bosswick
4 for Canal?

5 MR. BENNETT: Same objection.

6 THE WITNESS: I have no visibility into
7 their jobs.

8 BY MS. MACMULLIN:

9 Q During your employment, what role has Tom
10 Harvey played at Canal?

11 MR. BENNETT: Same objection.

12 THE WITNESS: Lawyer to Canal.

13 BY MS. MACMULLIN:

14 Q What role has Tom Harvey played in
15 overseeing Canal's operations?

16 MR. BENNETT: Same objection.

17 MS. LAZZARO: Objection.

18 THE WITNESS: I don't know if he and Bob
19 discuss Canal operations. Sometimes I discuss Canal
20 operations with Tom, but I don't feel like he weighs
21 in heavily on our structure or anything like that,
22 unless Bob asks him something direct.

23 BY MS. MACMULLIN:

24 Q So you're not aware of the full scope of Tom
25 Harvey's role with respect to Canal?

1 MR. BENNETT: Objection.

2 THE WITNESS: To me, his full role is a
3 lawyer to us. I don't see what he does beyond the
4 call I have with him or beyond connecting him to Bob.

5 BY MS. MACMULLIN:

6 Q During your employment, what role has Tarter
7 Krinsky & Drogin played for Canal?

8 MR. BENNETT: Same objection.

9 THE WITNESS: I really don't know. I --
10 like I said, I don't -- I don't think I spoke to them
11 before this.

12 BY MS. MACMULLIN:

13 Q During your employment, has Canal ever had
14 an HR Department?

15 MR. BENNETT: Objection.

16 THE WITNESS: Chase had us sign something
17 that said if we -- we were being harassed, report the
18 harassment to her.

19 Beyond that, I have utilized Tribeca's
20 in-office HR. Whether or not that is my HR, they've
21 been helpful.

22 BY MS. MACMULLIN:

23 Q And who at Tribeca Enterprises served as an
24 HR resource for you?

25 A A woman named Elfe, who just recently

1 left -- left last month. And there is a new HR --
2 head of HR named Katherine.

3 Q And what's Elfe's full name?

4 A I'd have to look. It's like Cimitara maybe.

5 Q Is it Elfe Cimicata?

6 A Sounds right.

7 Q Okay. During your employment, has Canal
8 ever employed anyone in-house to perform HR functions?

9 MS. LAZZARO: Objection.

10 MR. BENNETT: Objection on 30(b)(6) basis.

11 But you can answer.

12 THE WITNESS: I think someone named Laurent,
13 the last name starts with an L, is an HR lawyer that
14 has helped Canal.

15 BY MS. MACMULLIN:

16 Q Do you know the firm that he works for?

17 A I'd have to look. I just don't pay a lot of
18 attention to that.

19 MS. MACMULLIN: Okay. I think this is a
20 good stopping point. So we can come back on the
21 record at 1:55 p.m.

22 MR. BENNETT: Before we go off the record,
23 I'm just curious. Could you just let me know --

24 THE VIDEOGRAPHER: It's 10:40. We're going
25 off the record.

1 MS. MACMULLIN: Thank you.

2 (Recess.)

3 THE VIDEOGRAPHER: It is 10:57 a.m. and
4 we're back on the record.

5 BY MS. MACMULLIN:

6 Q Ms. Weeks-Brittan, during the period where
7 you and Ms. Robinson worked together, what were your
8 general impressions of Canal as a workplace?

9 A My general impressions of Canal when Chase
10 and I worked together, it was a little bit more of a
11 chained to your desk type of culture for me. I was
12 stressed a lot. I was new to the job and the on-call
13 nature made me nervous.

14 I was nervous to ask Chase for vacation days
15 because I felt I couldn't always take them, even if
16 Gillian agreed to cover me and vice versa. It was
17 just more intense all around than it is now.

18 Q During the period where you and Ms. Robinson
19 worked together, describe for me the atmosphere during
20 a typical working day.

21 MS. LAZZARO: Objection to form.

22 MR. BENNETT: Objection.

23 THE WITNESS: Hard to say, typical day, but
24 Gillian or I would get in. One of us at nine. One of
25 us at ten. We'd answered the phones all day,

1 depending on the on-call person, respond to E-mail
2 asks; make sure the day's schedule was moving ahead.

3 If I was on call that evening, I would make
4 sure to stay in cell service. Chase made it clear
5 that I couldn't like drop out of cell service. That I
6 had always had to be reachable. She would sometimes
7 call me.

8 Bob would call the after-hours phone if
9 something came up and I'd respond to whichever -- what
10 needed to be handled at the time.

11 BY MS. MACMULLIN:

12 Q How many days a week were you on call during
13 the time when you and Ms. Robinson were both employed?

14 A Not as much at the beginning since I was
15 ramping up. And like I said, I was told not to answer
16 the phone if Bob called for at least the first month
17 because I was learning from Gillian; making sure I was
18 up to speed.

19 And then as soon as I began on call, I would
20 guess probably a month in, Gillian and I would
21 alternate: One of us three times a week. One of us
22 four, and then we'd switch the next week.

23 Q Sorry for my heating noise. This is coming
24 on. I hope that's not, too, distracting, but let me
25 know if it is.

1 During the period where you and Ms. Robinson
2 worked together, would the TV ever be on in the
3 background while Canal employees worked?

4 A In the office?

5 Chase wasn't always with us in the office.
6 If Bob was in his office watching the news. There was
7 not a TV in our direct office where Gillian and I
8 worked.

9 Q Would Netflix ever be on in the background
10 while Canal employees worked?

11 A No.

12 MR. BENNETT: Objection.

13 You can answer.

14 THE WITNESS: Never in the office. Bob --
15 Bob only watched the news when he was in. Otherwise,
16 we had no TV on.

17 BY MS. MACMULLIN:

18 Q (Inaudible.) -- watch the news while he
19 worked?

20 THE REPORTER: My apologies.

21 MR. BENNETT: Yeah, you broke up a little
22 bit, Kate, there.

23 MS. MACMULLIN: Yeah. Oh, sorry. Can you
24 hear me now?

25 THE REPORTER: Yeah.

1 BY MS. MACMULLIN:

2 Q Okay. Would Mr. De Niro typically keep the
3 TV on in the background while he worked?

4 A Sorry, wrong pipe.

5 Bob, if he was in the office between
6 meetings, would have the news on a lot. He wasn't
7 like doing active work. It was when he had downtime.

8 Q Take the time that you need. We've all been
9 there.

10 Would music ever be on in the background
11 while Canal employees worked?

12 A No. It was -- it's a very quiet office.

13 Q What are your general impressions of
14 Mr. De Niro as a boss?

15 A He has been a great --

16 MR. BENNETT: Objection.

17 You can answer.

18 THE WITNESS: He's been a great boss to me.
19 When I started the role, like I said, I was hired and
20 I hadn't met him. So I was definitely nervous, both
21 wanting to impress. And because I think on screen, he
22 seems so intimidating.

23 I got the very pleasant work experience.

24 He's very casual, chill, goes by Bob. He's not a man
25 of many words, but you can always just call him up and

1 ask him something. He's very reachable on his phone,
2 which I appreciate it, since he does expect us to be
3 reachable on ours.

4 Like I said, when I mentioned I thought I
5 was going to be quitting when I wanted to move to
6 L.A., I had given up my lease in New York. He was
7 very receptive of that. I suggested the timeline for
8 when we hire, so that he was always left supported.
9 He appreciated that.

10 Made sure -- check in on if I was happy and,
11 you know, why I wanted to leave. And I was like, I --
12 I don't want to leave Tribeca. I want to stay at
13 Tribeca, but I do want to move to L.A. And I don't
14 know if that's feasible. Like I said, he worked with
15 me. Helped me promote.

16 I told him over the summer when things
17 started to get busy in office again that I felt we
18 needed a second person to assist with Gabby in the
19 office in New York since she was swamped.

20 He was receptive and open to that as well.
21 And that's why we hired Francis.

22 BY MS. MACMULLIN:

23 Q Did you ever perceive the workplace at Canal
24 to be hostile?

25 A I perceived Chase to be hostile.

1 Q Did you ever perceive the workplace at Canal
2 to be hostile?

3 A As a result --

4 MR. BENNETT: Objection.

5 THE WITNESS: -- of her hostility in the
6 workplace, yes. Not due to Bob.

7 BY MS. MACMULLIN:

8 Q Did you ever believe that Tiffany Chen
9 created a hostile work environment?

10 A We don't work for Tiffany Chen. So, no, I
11 felt in office hostility only from Chase.

12 Q Do you believe that Ms. Chen ever
13 contributed to hostility in the workplace?

14 MR. BENNETT: Objection.

15 You can answer.

16 THE WITNESS: I think it's a weird nature of
17 being an executive assistant to someone that does
18 include their personal life bleeding in. She's had
19 asks that have made us busier and stuff like that. Or
20 asks like on Bob's behalf or he'll ask something on
21 her behalf.

22 Adding her to travel, adding catering for
23 her, stuff like that, that definitely adds to the
24 workload. It doesn't add to my perceived -- any
25 perceived hostility in the workplace.

1 Also, I've never physically been in the
2 office with Tiffany. She doesn't come to the office.

3 BY MS. MACMULLIN:

4 Q Ms. Weeks-Brittan, we're going to share an
5 exhibit in the chat. It's Bates stamped
6 CANAL_0047395, and I'll mark this as Plaintiff's
7 Exhibit 2. And you can open it once you see it.

8 A Okay. I'm opening it.

9 (Whereupon, Exhibit 2 is marked for
10 identification and is attached
11 hereto.)

12 THE WITNESS: Should I read it first or you
13 summarizing it?

14 BY MS. MACMULLIN:

15 Q Just give me one second. I'm getting it
16 open, too.

17 A Okay.

18 Q So this is a document that has been produced
19 by defendants in this action. If you look at the
20 first page, do you see where it says, "Conversations:
21 1. Total messages: 116"?

22 A Yes. It's kind of slow to load. I see that
23 first page.

24 Q Take the time that you need when reviewing
25 it.

1 A Okay.

2 Q Do you see on that first page where it says:
3 "Chat: 116 messages between
4 Gillian Spear, Michael Kaplan, and
5 Sabrina"?

6 A I do.

7 Q Okay. And then, if you can turn to Page 7
8 of this PDF.

9 A Okay. It appears blank to me.

10 Q Okay. It shouldn't --

11 A Oh, it's load -- yeah. Yeah, I see. It's
12 loading slowly.

13 Okay. I see a bunch of black chunks, but I
14 see my own texts.

15 Q Right. So the -- this is the page that has
16 the Bates stamp at the bottom right-hand corner
17 CANAL_007 -- or excuse me, 0047401.

18 Do you see that?

19 A Yeah, on Bates number.

20 Q Okay. And do you see your message from
21 4:16 p.m. in the middle of the page?

22 A Yeah.

23 I see: "We can't have a hostile
24 workplace where she decides who to
25 trust one week and then switches

1 the next. Makes us all beyond
2 stressed."

3 I see that.

4 THE REPORTER: When you're reading, Sabrina,
5 if you could slow down for me, I'd appreciate it.

6 THE WITNESS: Oh, sorry. Should I read it
7 again?

8 THE REPORTER: Sure, why not.

9 THE WITNESS: "We can't have a hostile
10 workplace where she decides who she
11 trusts one week and then switches
12 the next. Makes us all beyond
13 stressed."

14 BY MS. MACMULLIN:

15 Q And we actually have a version of this that
16 defendants have produced without these redactions. So
17 if you'll just sit here with me, we're going to give
18 you a different version of this document.

19 A Okay. Is it in the chat?

20 Q Not yet.

21 A Okay.

22 Q Sorry, we're just having some trouble with
23 the exhibits, so let's continue with the questioning.

24 Are you aware of Mr. De Niro referring to
25 any female employees as "girls"?

1 A Yes. I think sometimes in E-mail, and Chase
2 would also call us "the girls" in the E-mail and add
3 us in.

4 Bob would sometimes also say, "the girls,
5 the office, Gillian/Sabrina." I have been called "the
6 girls" by both Chase and Bob.

7 Q How often would Mr. De Niro refer to any
8 female employees as "girls"?

9 MR. BENNETT: Through the course of her
10 entire employment, just to clarify?

11 MS. MACMULLIN: Yes.

12 BY MS. MACMULLIN:

13 Q During the course of your employment, how
14 often would Mr. De Niro refer to any female employees
15 as "girls"?

16 A Not frequently, to my knowledge. He does
17 try to say, "the office." Also, now, one of his
18 assistants is a male, so it doesn't apply.

19 I do remember some E-mail chains that may be
20 earlier on, 2018, 2019, Chase would say, "adding the
21 girls." Bob would say, "check with the girls." It
22 was a little more common then as a phrase. I haven't
23 heard it from him in a while.

24 Q Mr. De Niro would refer to you and Ms. Spear
25 as "the girls"; is that correct?

1 A Not often and not the only way. But like I
2 said, occasionally, in E-mail, I think I recall,
3 "adding the girls" or "check with the office, check
4 with the girls" from Chase, too.

5 Q At times Mr. De Niro referred to you and
6 Ms. Spear as "the girls"?

7 MS. LAZZARO: Objection.

8 MR. BENNETT: Objection.

9 THE WITNESS: At times both Bob and Chase
10 referred to us as "the girls."

11 BY MS. MACMULLIN:

12 Q Please listen to my question.

13 At times Mr. De Niro referred to you and
14 Ms. Spear as "the girls"; is that correct?

15 MS. LAZZARO: Objection.

16 MR. BENNETT: Objection. She's answered the
17 question.

18 You can answer.

19 THE WITNESS: At times.

20 BY MS. MACMULLIN:

21 Q How did you feel when Mr. De Niro referred
22 to female employees as "girls"?

23 A I know Gillian took more bother to it than I
24 did. And she told Chase via E-mail to no longer call
25 us "the girls." She told Chase that she didn't like

1 being called that, and that she had wanted her to stop
2 calling us that.

3 Gillian and I discussed it being more
4 offensive coming from Chase herself. Since Chase has
5 left, I don't think Bob has called us or me "the
6 girls" at all.

7 Q Did you ever find it inappropriate for
8 Mr. De Niro to call women "girls"?

9 MR. BENNETT: Objection.

10 You can answer.

11 THE WITNESS: I didn't find it
12 inappropriate. I felt like it was slightly more
13 acceptable of an older man of his generation. Not
14 great.

15 But once we alerted both Chase and Bob that
16 we didn't appreciate that, Bob has been very good at
17 using our names or "the office."

18 BY MS. MACMULLIN:

19 Q When did you alert Mr. De Niro that you did
20 not appreciate that?

21 MS. LAZZARO: Objection.

22 THE WITNESS: I think it was -- I think it
23 was later in -- maybe in the conversation where I
24 asked for a raise. Bob was asking my general
25 happiness at the company.

1 I explained that Chase made us feel a
2 certain way and belittled us, and would use
3 demeanative terms like "the girls" or adding in Bob's
4 assistants, which is a fine way to term us -- term
5 us/them in that regard. But she would put us down in
6 slights like that.

7 I explained we didn't like that. Didn't
8 like being called "the girls." Bob agreed.

9 BY MS. MACMULLIN:

10 Q During your time as an executive assistant,
11 are you aware of Mr. De Niro yelling at Ms. Robinson?

12 A I --

13 MR. BENNETT: Objection.

14 THE WITNESS: I heard -- yeah, I was going
15 to say I've since heard like that recording that was
16 made public. That wasn't during my time.

17 It's hard to say because I was not often --
18 they were not often in the office like talking in
19 front of me. Probably behind like in -- in his
20 office, which Gillian and I sat outside, if that makes
21 sense.

22 I do probably remember sometimes where I
23 definitely heard a loud voice from Bob, maybe a yell,
24 but we couldn't hear what they were saying.

25

1 BY MS. MACMULLIN:

2 Q How often do you recall overhearing
3 Mr. De Niro yell at Ms. Robinson?

4 MS. LAZZARO: Objection.

5 MR. BENNETT: Objection.

6 THE WITNESS: Not frequently, which doesn't
7 mean it didn't happen. I'm just saying I wasn't
8 there, so I can't really weigh in.

9 Like now, maybe once every couple months in
10 front of me, but like I said, I didn't hear direct
11 what was being discussed.

12 BY MS. MACMULLIN:

13 Q During your time as an executive assistant,
14 are you aware of Mr. De Niro yelling at any other
15 female employees?

16 MR. BENNETT: Objection.

17 You can answer.

18 THE WITNESS: I know he yelled at Kap. Kap
19 isn't so good at note taking. And sometimes he'd lose
20 track of stuff. I heard him raise his voice with him.

21 I heard him raise his voice -- both he and
22 Gillian yelled at each other one time when they had a
23 disagreement. She had accidentally sent him to the
24 wrong location for a meeting and he got mad about
25 that. And she escalated and raised her voice, too.

1 That's it.

2 He doesn't yell at me. I do, I think, a
3 good job at also deescalating things. If I've done
4 something wrong, I say, "oh, sorry, I made a mistake.
5 It won't happen again." And that's worked very well
6 for me in this job.

7 BY MS. MACMULLIN:

8 Q During your time as an executive assistant,
9 are you aware of Mr. De Niro cursing at Ms. Robinson?

10 MR. BENNETT: Objection.

11 You can answer.

12 THE WITNESS: I just didn't hear their
13 direct conversations. So, I mean, I heard that
14 recording that's made public, but that's the time I've
15 heard him cursing at her.

16 BY MS. MACMULLIN:

17 Q During your time as an executive assistant,
18 did Mr. De Niro ever curse at Ms. Robinson?

19 MR. BENNETT: Objection.

20 You can answer.

21 THE WITNESS: I just couldn't hear them when
22 they were in his office. So like maybe. It would be
23 a guess.

24 MR. BENNETT: Don't guess.

25 THE WITNESS: Okay. I can say, like, from

1 my own knowledge, sometimes if Bob's annoyed about
2 something not related to me, he would be like, "Ah,
3 that's fucking stupid." Sorry, pardon my French.

4 I didn't hear him like direct things at
5 Chase and I wasn't around for their direct
6 conversations. It was often Chase would close the
7 sliding door between our office and Bob's.

8 BY MS. MACMULLIN:

9 Q During your time as an executive assistant,
10 are you aware of Mr. De Niro cursing at any other
11 female employees?

12 MR. BENNETT: Objection.

13 You can answer.

14 THE WITNESS: I wouldn't say I've heard of
15 anything at them. Like I said, I've heard him curse
16 like generally, but not like directed at somebody.

17 BY MS. MACMULLIN:

18 Q During your time as an executive assistant,
19 are you aware of Mr. De Niro insulting Ms. Robinson?

20 MS. LAZZARO: Objection.

21 MR. BENNETT: Objection.

22 THE WITNESS: Since -- after Chase left, I
23 heard Bob insult Chase. And that was after everyone
24 was made aware of a lot of her spending. Yeah, he did
25 insult her at the time. But when I worked with Chase,

1 I -- I never heard Bob insult her.

2 BY MS. MACMULLIN:

3 Q And what did Mr. De Niro say that was
4 insulting towards Ms. Robinson?

5 MS. LAZZARO: Objection.

6 Can you specify the time period that you're
7 speaking about, Kate?

8 MS. MACMULLIN: I'm speaking about the time
9 that the witness has just testified she heard
10 Mr. De Niro insult Ms. Robinson.

11 MS. LAZZARO: Just to clarify, so after
12 Chase's resignation.

13 BY MS. MACMULLIN:

14 Q Please answer the question,
15 Ms. Weeks-Brittan.

16 A After Chase's resignation, I heard Bob
17 insult her and the situation.

18 Q And what did Mr. De Niro say?

19 A I -- I don't remember verbatim, but -- let
20 me check -- might -- it might have been the same
21 conversation that I had about the raise, too, when we
22 were like pulse checking the office.

23 He went into this like speech about trust
24 and how he trusts people until they break his trust.
25 And Chase broke his trust.

1 He was like -- you know like,
2 "she's fucking ridiculous. She's
3 stupid. This is stupid. I
4 can't" -- sorry, pardon my French.
5 "Don't fuck with me." Like, "you
6 know, I trust people until I
7 don't." And like -- "but are you
8 happy here?"

9 Like is -- you know, what -- like, he went
10 into that. Like, I knew he was angry about the
11 situation and he swore; but I -- I can't say more
12 specifically than that.

13 Q When did that conversation take place?

14 A I want to say October 2019. I think it was
15 probably after this was filed.

16 Q Are you aware of Mr. De Niro insulting any
17 other female employees?

18 MR. BENNETT: Objection.

19 You can answer.

20 THE WITNESS: The only other person I've
21 heard him insult was Kaplan, but that wasn't your
22 question.

23 BY MS. MACMULLIN:

24 Q And just to circle back, when you said after
25 this was filed, you were referring to after

1 Ms. Robinson filed her lawsuit?

2 A Yeah.

3 Q During your time as an executive assistant,
4 are you aware of Mr. De Niro saying anything
5 derogatory to Ms. Robinson?

6 MS. LAZZARO: Objection.

7 THE WITNESS: Not of anything that I heard
8 other than that one voicemail that I feel the world
9 has heard.

10 BY MS. MACMULLIN:

11 Q Are you aware of Mr. De Niro ever using the
12 word "bitch"?

13 A He might have called Chase a bitch post
14 this lawsuit. I -- I don't remember what his language
15 was exactly, but I never heard him call her a bitch
16 when she was an employee.

17 Q Tell me what you recall about Mr. De Niro
18 referring to Ms. Robinson as a bitch?

19 A I just don't remember the conversation. I
20 mean, he -- like I said, the October conversation
21 probably after this was filed. This was also at the
22 same time Gillian told him that she was probably
23 quitting.

24 He brought me in, asked me for a pulse
25 check, mentioned trust; and how everyone has his trust

1 until they don't. Like, he was saying like, "This is
2 fucking ridiculous" or that like -- he's not a man of
3 many words. So he'll like make -- just like -- he'll,
4 like, say some claim, like, "Oh, this is ridiculous."
5 He doesn't say like this lawsuit or Chase.

6 I was nodding. He's like, "Sorry."

7 Like, "How was it working for her?"

8 Like, "I can't believe I didn't see
9 this sooner."

10 Like, he was mad at himself.

11 I was like, "It wasn't great." And this is
12 when I mentioned that I made more in my previous job.
13 I had asked for Chase to match my salary. She said
14 no.

15 He was like, "I never" -- like,
16 "She didn't ask me."

17 And I was like, "I know. She said
18 no when I asked her at the time we
19 were face-to-face. She said no
20 right off the cuff. That being
21 said, I would appreciate a raise.

22 I've worked here for over a year.

23 I think I'm doing a great job."

24 The conversation, like, was a very
25 productive one, but he definitely started out mad, and

1 annoyed at the lawsuit and the situation.

2 Q Are you aware of anyone referring to
3 Ms. Robinson as Mr. De Niro's office wife?

4 A I feel like Chase maybe jokingly said that
5 once in front of me, like in the home, like "ha, ha,
6 I'm basically his office wife," but he never liked
7 used that term to her around me at least. I can't
8 speak beyond that.

9 Q When was that conversation with
10 Ms. Robinson?

11 A In general, late August, early September,
12 whenever I was working in the apartment.

13 Q Are you aware of Ms. Chen expressing
14 concerns about Ms. Robinson's relationship with
15 Mr. De Niro?

16 MR. BENNETT: Objection.

17 You can answer.

18 THE WITNESS: After Chase left, yes, because
19 I just didn't talk a lot to Tiffany before that time.

20 BY MS. MACMULLIN:

21 Q What concerns did Ms. Chen express?

22 A She thought that Chase was a thief. She
23 thought she was in love with Bob. She thought she
24 inserted herself in the home project. She thought she
25 wasn't good at her job. Lots of thoughts.

1 Q What was the basis for Ms. Chen's
2 supposition that Ms. Robinson was in love with
3 Mr. De Niro?

4 MR. BENNETT: Objection.
5 You can answer.

6 THE WITNESS: I don't know that there was
7 any basis beyond her being gossipy or Chase always
8 being in their home and -- she didn't like give me
9 specific examples of anything. She just would make
10 statements. I never thought Chase was in love with
11 Bob.

12 BY MS. MACMULLIN:

13 Q Did Ms. Chen express concerns about any
14 other female employees having feelings for
15 Mr. De Niro?

16 MR. BENNETT: Objection.
17 You can answer.

18 THE WITNESS: No other Canal employees.
19 BY MS. MACMULLIN:

20 Q Did Mr. De Niro ever touch you in a way that
21 made you feel uncomfortable?

22 A Never.

23 Q Did Mr. De Niro ever give you a hug that was
24 unwanted?

25 A No.

1 Q Are you aware of Mr. De Niro ever touching
2 any female in a -- any female employees in a way that
3 he did not touch male employees?

4 MR. BENNETT: Objection.

5 You can answer.

6 THE WITNESS: From what I saw, he's just not
7 a very touchy or talkative guy, so no.

8 BY MS. MACMULLIN:

9 Q During your employment as an executive
10 assistant at Canal, what types of perks would Canal
11 provide for its employees?

12 MS. LAZZARO: Objection.

13 THE WITNESS: Can I answer?

14 MS. LAZZARO: You can answer.

15 MR. BENNETT: Yes.

16 THE WITNESS: When I was hired and I asked
17 Chase to spell out benefits and vacation days and
18 stuff.

19 I think she mentioned that like Canal
20 employees received MetroCard and gym reimbursement up
21 to \$100. When I started the job, she mentioned that
22 we receive lunch in the office included as well.

23 BY MS. MACMULLIN:

24 Q One of the perks of your employment was
25 Canal paying for your lunches on workdays; is that

1 correct?

2 A Correct, when we were in the office.

3 Q During your time as an executive assistant,
4 would you ever seek expense reimbursement from Canal
5 for charges that you incurred?

6 A Yeah, like the petty cash document that I
7 submitted to Chase.

8 Q For what types of expenses, did you seek
9 reimbursement?

10 A I'd have to look through them, but
11 MetroCard, gym. Like the things that are spelled out.
12 If I needed to like Uber anywhere like for a work
13 reason, I'd seek reimbursement for that.

14 I asked Chase to reimburse an Uber once that
15 wasn't fully approved. That was the only time I
16 didn't fully get approval on things.

17 General -- yeah, I'm pretty sure it was just
18 like Ubers. Anything we bought for Bob maybe. Like,
19 if he needed, like, a newspaper. I know sometimes he
20 asked for, like, books and we'd like run to the store.
21 Stuff like that would get reimbursed.

22 Q Since Ms. Robinson's employment ended, have
23 you sought preapproval from anyone for charging Ubers
24 to Canal?

25 MR. BENNETT: Objection.

1 You can answer.

2 THE WITNESS: I asked Tasch after Chase left
3 how we should do certain things to make sure we were
4 aboveboard. I had a conversation with him about Ubers
5 once because I had accidentally charged the corporate
6 card. Like it was listed as my personal and business.

7 And I sent him a bunch of screenshots to
8 correct that. And I swapped it in the app, so I paid
9 onto the correct card. I told him of that mistake.

10 Other than that, no, but I would only Uber
11 to and from work. Like, if I was running an errand,
12 I'd go back to the office, if I was leaving work. The
13 Greenwich was always the location.

14 BY MS. MACMULLIN:

15 Q Since Ms. Robinson's employment ended, would
16 you charge Ubers to Canal if they were to or from
17 work?

18 MR. BENNETT: Objection.

19 THE WITNESS: Yeah, if there's a reason I
20 had to Uber, like if I had to Uber documents from work
21 to Bob's house to get him to sign them, so sure.

22 BY MS. MACMULLIN:

23 Q To your knowledge, did Canal have a
24 reimbursement policy that specified what expenses
25 employees could be reimbursed for?

1 MS. LAZZARO: Objection.

2 THE WITNESS: The only time it was really
3 specified was the gym reimbursement, MetroCard
4 reimbursement, and then, like, work-related Ubers.

5 I think maybe one -- one time -- our
6 corporate card is an AMEX. One time we paid something
7 that didn't accept AMEX and I used my personal card.
8 And I sought reimbursement for that.

9 BY MS. MACMULLIN:

10 Q To your knowledge, did Canal have a
11 reimbursement policy that specified what expenses you
12 could be reimbursed for?

13 MR. BENNETT: Objection. We're sort of
14 hitting the 30(b)(6) issue.

15 But you can answer.

16 THE WITNESS: Well, I just submitted my
17 reimbursement. Like, petty class -- petty cash claims
18 to Chase. So she would approve them, or on one
19 instance, she didn't approve one. And that was sort
20 of how -- like, the policy wasn't like written
21 anywhere.

22 BY MS. MACMULLIN:

23 Q Describe the process for receiving
24 reimbursement during your time as an executive
25 assistant.

1 MR. BENNETT: Objection. That relates
2 directly to the 30(b)(6) deposition.

3 Sabrina, you can answer in your own personal
4 experience.

5 THE WITNESS: I filled out a petty cash
6 Excel sheet that I was provided with. I updated it
7 with the date, the charge, and a note saying what it
8 was for. And then I sent that to Chase. And then,
9 she'd give me cash.

10 BY MS. MACMULLIN:

11 Q Were there categories of expenses that you
12 charged to Canal without filling out a petty cash
13 spreadsheet?

14 MR. BENNETT: Same objection.
15 You can answer.

16 THE WITNESS: What do you mean? Like, I --
17 I would have wanted to submit the petty cash, so that
18 I would get my own money back.

19 BY MS. MACMULLIN:

20 Q Were there categories of expenses that you
21 charged to Canal without filling out a petty cash
22 spreadsheet?

23 A That would just be like the corporate card,
24 like for paying for Bob's plane or like Bob's hotel.
25 That -- that stuff. Like no -- no one paid that in

1 petty cash because Bob's expenses are on the corporate
2 card.

3 I would have sought all my own expenses back
4 via petty cash because I would have wanted to be paid
5 back if I had charged.

6 Q To your knowledge, did Canal have a practice
7 of paying for its employees' working meals?

8 MR. BENNETT: Objection.

9 THE WITNESS: Like I said, lunch at the
10 office.

11 BY MS. MACMULLIN:

12 Q To your knowledge, did Canal pay for Michael
13 Kaplan's meals?

14 A Lunch at the office.

15 Q So --

16 A Oh, and coffee. Coffee, sorry.

17 Q So, to your knowledge, did Canal pay for
18 Michael Kaplan's lunches in the office and coffee?

19 A Yeah, we'd often order lunch together.

20 Q To your knowledge, did Canal pay for Gillian
21 Spear's lunches in the office and coffee?

22 A Yeah. Gillian and I almost always ordered
23 together.

24 Q To your knowledge, did Canal pay for Lulu
25 White's lunches in the office and coffee?

1 A When Lulu was in the office with us, yes.
2 We'd all order a group lunch, but Lulu was often with
3 Chase uptown. So they probably did their own thing,
4 but I don't want to speculate.

5 Q Do Canal -- or let me rephrase my question.
6 Did Canal office employees pay for lunches
7 using a Canal credit card?

8 A We were logged into a Caviar account on our
9 work computers. So the card was already in there.
10 And we could order lunch, like, from one place to the
11 office on Caviar, which we did.

12 Q And Caviar is a food delivery service; is
13 that correct?

14 A Yeah.

15 Q So meals for Canal employees that were
16 ordered through Caviar were paid for directly by Canal
17 without the need to submit a petty cash sheet; is that
18 correct?

19 MR. BENNETT: Objection.

20 You can answer.

21 THE WITNESS: Lunches, yeah.

22 BY MS. MACMULLIN:

23 Q So lunches for Canal employees that were
24 ordered through Caviar were paid for directly by Canal
25 without the need to submit a petty cash sheet; is that

1 correct?

2 A Yeah.

3 MS. LAZZARO: Objection.

4 BY MS. MACMULLIN:

5 Q What, if anything, were you told about Canal
6 paying for employee meal expenses?

7 A I was told that Canal paid for lunch in the
8 office and that we should order from one place. Like
9 not one -- like, Gillian and I would order together.
10 Not like I'd get a lunch, she'd get a lunch.

11 Q Did you ever discuss your meal expenses with
12 Mr. De Niro?

13 A I don't think so.

14 Q Did Canal ever play -- ever pay for employee
15 dinners if you were working late?

16 MS. LAZZARO: Objection.

17 MR. BENNETT: Objection.

18 You can answer.

19 THE WITNESS: Yeah, I think maybe once or
20 twice around Christmas when it was really busy, we had
21 food sent up from the grill downstairs in our
22 building.

23 Locanda Verde is also in our office
24 building. So same thing. If we were there really
25 late, we'd probably get one of the two of those.

1 BY MS. MACMULLIN:

2 Q And Locanda Verde is a restaurant that
3 Mr. De Niro owns; is that correct?

4 A Yeah.

5 Q And when you're referring to the grill, what
6 restaurant is that?

7 A The Tribeca Grill. It's in the downstairs
8 of the New York office.

9 Q During your time as an executive assistant,
10 were there any limits on the meals that Canal paid for
11 on behalf of employees?

12 MR. BENNETT: Objection.

13 You can answer.

14 THE WITNESS: I don't think I was ever told
15 of a limit, just beyond, like, a reasonable lunch
16 expense. I don't know. We'd do like 20, 30 a person.

17 No, I mean, in -- that Chase was, like,
18 looking at the account, so we -- we didn't like
19 go absurd. Sometimes we'd have -- go really nice.

20 I think Chase took me and Kap to Nobu when I
21 started as a new welcome lunch. Those were,
22 obviously, like, more expensive meals.

23 BY MS. MACMULLIN:

24 Q During your time as an executive assistant,
25 would Canal pay for any of your car transportation,

1 such as taxies, Ubers, or Lyfts?

2 A Yeah, I mentioned the times like Ubers to
3 and from work, if I caught a cab instead, something
4 (phonetic), I'd put that on my petty cash, date it,
5 and submit the report.

6 Q To your knowledge, did Canal have a practice
7 of paying for its employees car transportation?

8 MR. BENNETT: Objection. It specifically
9 asks for a practice which is a 30(b)(6) topic.

10 Limit your answer to your personal
11 knowledge, and go ahead.

12 THE WITNESS: MetroCard reimbursement was
13 spelled out to me. And Ubers were only, like, if I
14 was running something up to Bob, if I had to pick
15 something up, if anything was asked of me.

16 And I couldn't take the subway for some
17 reason, then I'd take an Uber, or a taxicab, and
18 submit a petty cash report.

19 BY MS. MACMULLIN:

20 Q What Ubers, taxies, or Lyfts would Canal pay
21 for for Canal employees?

22 MR. BENNETT: Same objection.

23 THE WITNESS: Yeah, I mean, not like --
24 clearly, not all of them. I -- I -- once coming home
25 from Thanksgiving to New York, I was caught in a snow

1 storm. I couldn't get back to New York. Chicago
2 airport canceled all flights.

3 I asked Chase and told her and Kap, like,
4 hey, I don't know if I can make it in in the morning.
5 I'm stuck in Chicago. Chase told me I had to open the
6 office, to figure it out.

7 I took the only flight I could from Chicago
8 to D.C. It landed at, like, 12 or 1:00 a.m. I asked
9 Chase to pay for that Uber. It was a three-hour Uber
10 from D.C. to New York in the middle of the night.

11 She said that Canal would only reimburse
12 half. And she paid me back half of, like, a \$400
13 Uber.

14 That was the time -- like, I guess, it
15 wasn't to work, but it was to get me back to work
16 during a weird circumstance. And it was not paid for
17 fully, so --

18 BY MS. MACMULLIN:

19 Q Did you ever charge transportation expenses
20 directly to a Canal credit card?

21 A Like Bob's?

22 Q Like any Canal credit card without
23 submitting a petty cash sheet.

24 A Like -- you mean, like, Bob's travel or,
25 like, what do you mean?

1 Q Did you ever charge transportation expenses
2 directly to any Canal credit card?

3 A I'm asking you, whose transportation? I
4 charged a lot of Bob's transportation expenses direct
5 to Canal credit card.

6 Q Did you ever charge your own transportation
7 expenses directly to any Canal credit card?

8 A No. We now have a Canal Uber account that,
9 like, some of Grace's employees use as well. But when
10 I worked with Chase, I just sought petty cash
11 reimbursement.

12 Q When did Canal set up a Canal Uber account?

13 A Fairly recently. Elliot, Bob's son, has
14 like companions that take him out in the city because
15 Elliot has [REDACTED] And they were constantly asking us
16 to order Ubers for them, which is just like
17 logistically challenging because I didn't know exactly
18 where they were and stuff.

19 So we thought it would be easy to do that.
20 I told Tasch we were doing that. And, now, the two
21 employees have access to that as well.

22 Q Now, that Canal has an Uber account, is it
23 correct that you no longer need to submit petty cash
24 sheets to have your Ubers paid for by Canal?

25 MR. BENNETT: Objection, on the basis of the

1 30(b)(6) topics. And from this point forward, and
2 with respect to the questions previously put to the
3 witness, the defendants will take the position that
4 they have waived the right to request information on
5 that topic from the 30(b)(6) deposition.

6 With that objection on the record, Sabrina,
7 you can testify as to your personal knowledge.

8 THE WITNESS: The account that Elliot's
9 companions used goes directly to Tasch for oversight.
10 I work in L.A. now and -- and no longer get reimbursed
11 or seek reimbursement for my travel. I have a car I
12 drive to work. I don't Uber.

13 BY MS. MACMULLIN:

14 Q During your employment, Mr. De Niro
15 generally bought gifts for Canal employees on their
16 birthdays; is that correct?

17 MS. LAZZARO: Objection.

18 MR. BENNETT: Objection.

19 You can answer.

20 THE WITNESS: Not really anymore. Like I
21 definitely got gifts. I've gotten, like, Christmas
22 gifts and stuff. Chase -- Chase was big in gifts.

23 Like this year, Bob wished me happy
24 birthday. I didn't get a gift. I got a bonus at
25 Christmas.

1 BY MS. MACMULLIN:

2 Q Prior to the end of Ms. Robinson's
3 employment, Mr. De Niro generally bought gifts for
4 Canal employees on their birthdays; is that right?

5 MR. BENNETT: 30(b)(6) objection.

6 You can answer.

7 THE WITNESS: I don't think Bob bought
8 people gifts. I think Chase maybe checked and like
9 got approval for certain gifts, but I actually didn't
10 celebrate my birthday in the time that I worked there
11 before Chase left, so I'm not sure.

12 BY MS. MACMULLIN:

13 Q To your knowledge, Mr. De Niro also
14 sometimes bought gifts for former Canal employees;
15 correct?

16 MR. BENNETT: 30(b)(6) objection.

17 You can answer.

18 THE WITNESS: I -- I feel like Robin got a
19 gift, but I didn't know much about Robin until post
20 Chase. I think Chase got approval.

21 Like on the birthday list, it would say like
22 "Chase handles" for people like Robin and Michael
23 Kaplan; and Chase would handle it.

24 MS. MACMULLIN: I'd like to take a
25 ten-minute break here. So we can come back at 3:00

1 p.m. Eastern.

2 MR. BENNETT: Okay.

3 MS. MACMULLIN: Okay.

4 THE VIDEOGRAPHER: It is 11:50 and we're
5 going off the record.

6 (Recess.)

7 THE VIDEOGRAPHER: It is 12:01 p.m. and we
8 are back on the record.

9 BY MS. MACMULLIN:

10 Q Before Ms. Robinson's employment ended,
11 Canal maintained an -- an American Express card with
12 Ms. Robinson's name on it; right?

13 A Correct.

14 Q And during your employment, tell me everyone
15 who was allowed to use the Canal American Express card
16 under Ms. Robinson's name.

17 MS. LAZZARO: Objection.

18 MR. BENNETT: Objection as to the 30(b)(6).

19 But you can answer, based on your knowledge.

20 THE WITNESS: Gillian and I could use it on
21 Bob's expenses. Like, if we were paying for a plane
22 or flight, his travel agents, the charter person, they
23 have access.

24 BY MS. MACMULLIN:

25 Q Couldn't Ms. Robinson use the American

1 Express card?

2 A Oh, yeah. I -- I thought you meant someone
3 who wasn't named on the card.

4 Q Could anyone else use the American Express
5 card with Ms. Robinson's name on it?

6 MR. BENNETT: 30(b)(6) objection.

7 You can answer.

8 THE WITNESS: I think anyone getting
9 anything for Bob, but I thought Kaplan had his own
10 cards; but I don't know if he used hers.

11 Maybe Lulu but -- if Chase gave her
12 permission. I don't know.

13 BY MS. MACMULLIN:

14 Q Were all Canal employees allowed to use the
15 American Express card under Ms. Robinson's name?

16 MR. BENNETT: Same objection on the basis of
17 30(b)(6).

18 You can answer, just in your own personal
19 knowledge.

20 THE WITNESS: My personal knowledge is that
21 Gillian or I could use it to give to people who were
22 paying for Bob's expenses. I would send it to the
23 travel agent or the charter person. I couldn't use
24 her card, like, on my own.

25

1 BY MS. MACMULLIN:

2 Q The card number and credentials for the
3 American Express card under Ms. Robinson's name were
4 accessible to people in the office; correct?

5 MR. BENNETT: Objection.

6 You can answer.

7 THE WITNESS: Yeah, Gillian and I had the
8 card number.

9 BY MS. MACMULLIN:

10 Q The card number and credentials for the
11 American Express card under Ms. Robinson's name were
12 saved as a contact in Canal's system; is that correct?

13 A I don't actually know if it was Chase's card
14 or Michael Kaplan's card; but one of their cards was
15 saved as the AMEX credit card that we could use for
16 Bob charges.

17 Q And a scan of the front and back of the
18 American Express card was provided to everyone who
19 worked in Canal's office; is that correct?

20 MR. BENNETT: Ms. Robinson's card, Kate?
21 Her answer referenced two cards. I just want to
22 clarify.

23 BY MS. MACMULLIN:

24 Q A scan of the front and -- and back of the
25 American Express card under Ms. Robinson's name was

1 provided to everyone who worked in Canal's office; is
2 that correct?

3 A I don't think so, actually. I think it was
4 Michael's card. Chase was more protective of hers.
5 And we had Michael's license, too, that we'd send
6 along if somebody needed that.

7 Q A scan of both cards was provided to
8 everyone who worked in Canal's office; is that
9 correct?

10 MS. LAZZARO: Objection.

11 MR. BENNETT: Objection. She answered the
12 question.

13 THE WITNESS: I don't think I had a scan of
14 Chase's. And I'm only talking about myself and
15 Gillian. I don't know how -- who you're saying is an
16 employee beyond us, but we had Michael's AMEX credit
17 card and his license.

18 BY MS. MACMULLIN:

19 Q The card number and credentials for the
20 Canal American Express card under Ms. Robinson's name
21 and the Canal American Express card under Mr. Kaplan's
22 name were both provided to Canal office employees;
23 correct?

24 A I'm disagreeing. I don't think that I
25 had --

1 MR. BENNETT: Objection.

2 THE WITNESS: Chase's.

3 MR. BENNETT: That's the third time you've
4 asked the question. It's the same answer.

5 THE WITNESS: I don't doubt that I had her
6 numbers, but it was Michael Kaplan's card front and
7 back pictured; and his license that we had access to.

8 BY MS. MACMULLIN:

9 Q What do you mean when you say, you had her
10 numbers?

11 A Like maybe she put them in an E-mail that I
12 was on to a travel agent. Like, I didn't store them
13 anywhere. Maybe they were, like, recorded somewhere;
14 but the card that we had the credentials for and the
15 license was Kaplan's.

16 Q You don't recall having a contact in your
17 phone containing the Canal card under Ms. Robinson's
18 name?

19 MR. BENNETT: Objection. It's been asked
20 and answered multiple times.

21 THE WITNESS: I recall having a card in my
22 phone, but I recall that card being Michael's. Maybe
23 Chase was listed there as well, but the credentials we
24 had were for Kaplan's.

25

1 BY MS. MACMULLIN:

2 Q Is that card still saved as a contact in
3 your phone?

4 A I don't think so, but do you want me to
5 check?

6 Q You don't need to check right now.

7 A I know Chase's card is not -- not active
8 anymore. We canceled it.

9 Q Um-hmm. Did Ms. Robinson ever lend anyone
10 at Canal the physical card for the Canal American
11 Express card under her name?

12 MS. LAZZARO: Objection.

13 THE WITNESS: Can I answer?

14 MR. BENNETT: Based on your personal
15 experience, yes.

16 THE WITNESS: I think -- I think once or
17 twice during the apartment project, she lent it
18 physically to me to use for taxies.

19 BY MS. MACMULLIN:

20 Q Do you recall any other occasions on which
21 Ms. Robinson lent her physical card to you?

22 A I think it was just during that time during
23 the apartment project. I know -- I'm pretty sure
24 Michael Kaplan's card we used to keep in the office,
25 like where we filed the mail and stuff. Yeah, I think

1 it was his.

2 Q To your knowledge, did Ms. Robinson ever
3 lend anyone else at Canal the physical card for the
4 Canal American Express under her name?

5 A I don't have direct knowledge of her handing
6 it to anyone else.

7 Q Tell me everything that you recall the Canal
8 American Express card under Ms. Robinson's name being
9 used for.

10 MR. BENNETT: Objection.

11 THE WITNESS: I don't --

12 MR. BENNETT: You can answer.

13 THE WITNESS: -- know how to answer that.

14 I -- I mean, we would send it to either hers or
15 Michael's to book Bob's travel, to pay for hotels.

16 I -- I really think it was Michael's card, though. I
17 don't -- I don't know.

18 BY MS. MACMULLIN:

19 Q What categories of expenses were charged on
20 the Canal credit card in Ms. Robinson's name versus
21 the one in Mr. Kaplan's name?

22 MS. LAZZARO: Objection.

23 MR. BENNETT: Objection based on the
24 30(b)(6) issue.

25 You can testify about personal knowledge.

1 THE WITNESS: There was some, like, weird
2 distinction. I am trying to remember. There was some
3 distinction. I don't -- whether it was, like, Bob
4 business or Bob personal on -- on one card or the
5 other, and we would decide whose to use for that. I
6 don't -- I don't remember which was applied to which.

7 BY MS. MACMULLIN:

8 Q What did you under -- okay. Let me rephrase
9 my question.

10 The Canal American Express card under
11 Ms. Robinson's name was used for meals for the office;
12 is that correct?

13 MR. BENNETT: Objection 30(b)(6).

14 You can answer.

15 THE WITNESS: I -- I would have to check.
16 Like, it was probably the one she put in the Caviar
17 account.

18 BY MS. MACMULLIN:

19 Q Do you recall the credit card in
20 Ms. Robinson's name being used for employee meal
21 expenses?

22 MS. LAZZARO: Objection.

23 THE WITNESS: There was, like, six months of
24 time-ish when I worked with Chase, and then her card
25 was canceled. And then, it was Michael's card. So I

1 just don't know if it was always Michael's card.

2 Maybe -- it was probably Chase's at that time.

3 I know there were rules. I don't know if it
4 was, like, business travel on Chase and something else
5 on Michael; but I viewed those as being very arbitrary
6 at the time and no reason for the difference.

7 And after she left and we canceled her card,
8 it -- it was just, like, not ever split like that
9 again. So I'm -- I don't remember.

10 BY MS. MACMULLIN:

11 Q The Canal American Express card under
12 Ms. Robinson's name was used for meals for
13 Mr. De Niro; is that correct?

14 MS. LAZZARO: Objection.

15 THE WITNESS: That's not correct.

16 MR. BENNETT: Objection. 30 --

17 BY MS. MACMULLIN:

18 Q Sorry, I missed your answer.

19 A Bob has his own credit card now. I don't
20 think Chase was buying him meals.

21 Q The Canal American Express card under
22 Ms. Robinson's name was used for groceries for the
23 office; is that correct?

24 MR. BENNETT: 30(b)(6) objection.

25 You can answer, subject to that objection.

1 THE WITNESS: It was probably the card that
2 was in the Instacart.

3 BY MS. MACMULLIN:

4 Q The Canal American Express card under
5 Ms. Robinson's name was used for groceries for
6 Mr. De Niro; is that correct?

7 MR. BENNETT: Same objection.

8 THE WITNESS: I don't think so. I don't
9 know. If Chase ordered him groceries, maybe.

10 BY MS. MACMULLIN:

11 Q The Canal American Express card under
12 Ms. Robinson's name was used for Ubers for people
13 other than Ms. Robinson; is that correct?

14 MR. BENNETT: Same objection.

15 THE WITNESS: I don't think so.

16 BY MS. MACMULLIN:

17 Q The Canal --

18 A Petty cashed our Ubers, like I said, and
19 then I would bill back for it.

20 Q The Canal American Express card under
21 Ms. Robinson's name was used for Lyfts for people
22 other than Ms. Robinson; is that correct?

23 MR. BENNETT: Same objection.

24 THE WITNESS: I have no idea. I mean, like
25 I said, how Elliot's companions require Uber and Lyft,

1 maybe Chase did that as well for them; but I don't
2 know.

3 BY MS. MACMULLIN:

4 Q What expenses for Mr. De Niro's family do
5 you recall being placed on the credit card in
6 Ms. Robinson's name?

7 MS. LAZZARO: Objection.

8 THE WITNESS: Probably the holiday gifts
9 that Chase bought.

10 MR. BENNETT: Don't guess.

11 THE WITNESS: Yeah, I don't know. I'm
12 guessing. I mean, this is, like, years ago, you know.
13 I -- I don't -- the cards look exactly the same on the
14 outside. They're -- doesn't even say the name on the
15 front of the card. It says on the back AMEX. I
16 wasn't like paying hyper-close attention.

17 BY MS. MACMULLIN:

18 Q Do you have an understanding as to under
19 what circumstances Ms. Robinson was authorized to use
20 SkyMiles to book travel -- to book her travel? Excuse
21 me.

22 A I never heard of the SkyMiles --

23 MR. BENNETT: Objection.

24 THE WITNESS: -- until after this when I
25 found out that she had transferred them to her

1 account. I didn't -- I was not aware of it at the
2 time.

3 BY MS. MACMULLIN:

4 Q You're not aware of what conversations
5 Ms. Robinson may have had with Mr. De Niro concerning
6 her SkyMiles usage; is that correct?

7 A I'm not aware of their direct conversation.

8 Q After Ms. Robinson's employment with Canal
9 ended, were any changes made to Canal's policies
10 concerning expenses?

11 MR. BENNETT: Objection on the basis of
12 30(b)(6). The question specifically calls for her to
13 opine about the topic of the 30(b)(6).

14 Subject to that objection, Sabrina, within
15 your own personal knowledge, if you can respond to the
16 question, go ahead.

17 THE WITNESS: After Chase left, we worked
18 more closely and directly with Tasch to understand how
19 to streamline things. We got rid of her card. We got
20 rid of Kaplan's card. Everything Bob related goes
21 direct on an AMEX that Tasch oversees.

22 We no longer get gym reimbursement. The
23 office assistants do still get lunch on Caviar.

24 BY MS. MACMULLIN:

25 Q Was any explanation offered for why those

1 changes were being made?

2 A For oversight to prevent someone from
3 running rampant with the corporate card again.

4 Q Did there come a time when you became aware
5 that Ms. Robinson was threatening legal action against
6 Mr. De Niro?

7 A I think I became aware of it when it was
8 taken, when legal action was taken.

9 Q Meaning the filing of this lawsuit in
10 October 2019?

11 A Yeah.

12 MR. BENNETT: Objection.

13 THE WITNESS: I think that's when I first
14 became aware of it.

15 BY MS. MACMULLIN:

16 Q Weren't you informed in advance that
17 Ms. Robinson was threatening legal action?

18 MS. LAZZARO: Objection to form.

19 MR. BENNETT: Objection.

20 To the extent that any information that
21 might be responsive to that comes from an attorney on
22 behalf of Canal, you should not answer the question.

23 If you're able to answer the question
24 otherwise, go right ahead.

25 THE WITNESS: I do not remember the time

1 line of if I was given a heads-up or if I just found
2 out, and then it had already been taken.

3 BY MS. MACMULLIN:

4 Q Okay. We're going to put a document in the
5 chat, which is Bates stamped CANAL_0048976, which I'll
6 mark as Plaintiff's Exhibit 3.

7 (Whereupon, Exhibit 3 is marked for
8 identification and is attached
9 hereto.)

10 THE WITNESS: I think you may have frozen,
11 Kate.

12 MS. MACMULLIN: Am I back?

13 MS. LAZZARO: You still look frozen on my
14 end, too.

15 THE WITNESS: But I did get the document.

16 THE VIDEOGRAPHER: You guys want to go off
17 the record here?

18 MS. MACMULLIN: Sure. I can -- I can see
19 myself frozen.

20 THE VIDEOGRAPHER: All right. It is 12:21
21 and we're going off the record.

22 (Recess.)

23 THE VIDEOGRAPHER: It is 12:23 and we're --
24 oh, hold on. It is 12:23 and we're back on the
25 record.

1 BY MS. MACMULLIN:

2 Q Okay. Ms. Weeks-Brittan, were you able to
3 open the document that's been marked as Plaintiff's
4 Exhibit 3?

5 A I was.

6 Q Okay. And do you see on the first page of
7 the document where it says, "23 messages between
8 Gillian Spear, Kevin Rivas, Sabrina Weeks-Brittan, and
9 Tiffany Chen"?

10 A I see.

11 Q Who is Tiffany Chen?

12 A Bob's girlfriend.

13 Q What is Ms. Chen's relationship with
14 Mr. De Niro?

15 A Bob's girlfriend.

16 Q What is Ms. Chen's relationship to Canal?

17 A She's Bob's girlfriend.

18 Q During the time you were an executive
19 assistant, what was Ms. Chen's involvement in the
20 operations of Canal?

21 A Not involved in the operations. She'd ask
22 us for things or ask -- relay things from Bob. She
23 didn't like have office oversight or anything.

24 Q What is Ms. Chen's present involvement in
25 the operations of Canal?

1 A About the same, but less chummy. She's
2 taken a bit of a step back. Still no, like, direct
3 office involvement. She'll, like, ask us for things
4 or -- like catering that relates to their travel and
5 stuff like that.

6 Q Who is Kevin Rivas?

7 A He is Tiffany's assistant.

8 Q And does Mr. Rivas have any relationship to
9 Canal?

10 A No. He'll just relay, like, oh, Tiffany
11 wants this catering. Tiffany wants XYZ.

12 Q And if I can turn your attention to the
13 second page of the document, do you see the message
14 from Tiffany Chen around the middle of the page at
15 8:49 p.m. that says, "Well, I'm one-third living at
16 the moment"?

17 A Yeah.

18 Q And could you read aloud the last line of
19 that message that begins, "And Chase"?

20 A "And Chase got a lawyer and
21 they are threatening to sue unless
22 Bob gives into her demands," koala
23 face.

24 Q Is this text message from Tiffany Chen the
25 first time you learned that Ms. Robinson was

1 threatening legal action against Mr. De Niro?

2 MR. BENNETT: Objection.

3 You can --

4 THE WITNESS: Probably. I just -- like, he
5 sued her first. I don't -- I don't, like, know --
6 remember the exact timeline. That probably is when I
7 was made aware of it.

8 BY MS. MACMULLIN:

9 Q After you received the text message from
10 Ms. Chen that Ms. Robinson was threatening a lawsuit,
11 did you have any discussions with anyone affiliated at
12 Canal about Ms. Robinson's threat to bring a lawsuit?

13 A I'm sure Gillian at the time because we were
14 probably both sitting in the office when we got that
15 text.

16 Q Do you recall what was discussed during that
17 conversation with Gillian?

18 A We thought -- this is a -- I'm, like,
19 muddling together what I imagine were multiple
20 conversations because I don't remember specific
21 instance. This was years ago.

22 So just, like, general timeline. We thought
23 that her lawsuit was not valid. We thought it was
24 more like her name was dragged through the mud a bit
25 with Bob. So it seemed like it was kind of a petty

1 rhetoric.

2 Gillian and I both did not have a great
3 working relationship with Chase and were happy when
4 she left. So I think a -- a lot of people, including
5 in the office, it was just like a gossipy time of, oh,
6 my God, Chase is suing -- (Inaudible.) It's like the
7 most traumatic thing that's happened in my employment
8 ever.

9 So there was just a lot of gossip. I don't
10 remember exact conversations.

11 Q This text message from Ms. Chen informing
12 you that Ms. Robinson was threatening to bring a
13 lawsuit was sent before Canal brought its lawsuit
14 against Ms. Robinson; is that correct?

15 MR. BENNETT: Objection.

16 THE WITNESS: I don't know the timeline. If
17 you tell me that it's before, then sure.

18 BY MS. MACMULLIN:

19 Q What, if anything, were you told about the
20 nature of the lawsuit that Ms. Robinson was
21 threatening?

22 MR. BENNETT: Objection.

23 Again, to reiterate, don't disclose
24 information you discussed with Canal's legal counsel.
25 Otherwise, you can answer.

1 THE WITNESS: I really don't -- I mean,
2 maybe you'll have to prove me otherwise, but I really
3 don't recall learning of the nature of it until I read
4 the claims.

5 Like, maybe speculation of stuff, but I
6 don't -- I was surprised by the claims. So I don't
7 think that I was aware of what she was going to sue
8 on.

9 BY MS. MACMULLIN:

10 Q After you received the text message from
11 Ms. Chen, did you speak with Ms. Chen concerning
12 Ms. Robinson's threat to bring a lawsuit?

13 A I generally spoke to her at the time, like
14 around that time, but I don't know if it was specific
15 to the lawsuit or just, like, general fallout post
16 Chase.

17 I don't remember like a specific instance if
18 that's what you're -- what you're asking.

19 Q How did Ms. Chen react to the news that
20 Ms. Robinson was threatening legal action?

21 MR. BENNETT: Objection.

22 You can answer.

23 THE WITNESS: I think, like, off the text,
24 it seems, like, she thought it was comical.

25

1 BY MS. MACMULLIN:

2 Q Tell me everything that Ms. Chen told you
3 about Ms. Robinson's threat to bring a lawsuit.

4 A I don't remember specific conversations. I
5 guess -- like just at the time, I think she generally
6 thought it was ridiculous. It was unfounded. She
7 thought Chase didn't have a case and that it was
8 obvious that Chase stole. And it was absurd and it
9 was funny and whatever. Bring it on type of
10 mentality.

11 Q To your knowledge, how did Mr. De Niro react
12 to the news that Ms. Robinson was threatening a
13 lawsuit?

14 MR. BENNETT: Objection.

15 You can answer.

16 THE WITNESS: I don't think I spoke with him
17 about it until that conversation in October when the
18 lawsuit was actually upon us.

19 BY MS. MACMULLIN:

20 Q After you received the text message from
21 Tiffany Chen, did you speak to anyone at Berdon about
22 Ms. Robinson's threat to bring a lawsuit?

23 A I don't --

24 MS. LAZZARO: Objection.

25 THE WITNESS: -- think so. Like, maybe

1 Tasch and -- I know there was a period of time where
2 Tasch, like, asked for a lot of, like, our receipts
3 and petty cash; and time cards; and stuff to be sent.

4 Maybe it was the same time period as this,
5 but I don't think he was -- like, we didn't have a
6 conversation about what each of us felt about the
7 lawsuit. I think he was maybe just asking me to
8 produce certain things.

9 BY MS. MACMULLIN:

10 Q What did Mr. Tasch ask you to produce?

11 MR. BENNETT: Unless you can answer this
12 without referring to information disclosed to you by
13 legal counsel from Canal, then don't answer the
14 question.

15 But if you're, otherwise, able to answer the
16 question, you -- you may do so.

17 THE WITNESS: I don't really think I can
18 answer it beyond what I already said of, like, records
19 of my time cards and petty cash, and certain E-mails I
20 had sent to Chase that I produced.

21 BY MS. MACMULLIN:

22 Q What documents did Mr. Tasch ask you to
23 provide?

24 MR. BENNETT: Same instruction, Sabrina.

25 THE WITNESS: I don't -- I mean, I'd have to

1 look back in E-mail, but I -- I think I just sent him,
2 like, expenses and petty cash stuff.

3 BY MS. MACMULLIN:

4 Q Do you recall any conversations with anyone
5 else before Canal filed its lawsuit against
6 Ms. Robinson about the fact that she had threatened
7 legal action?

8 MS. LAZZARO: Objection.

9 THE WITNESS: Can you just remind me of
10 when -- what that timeline was, so I can think back?

11 BY MS. MACMULLIN:

12 Q Canal's lawsuit was filed on August 17th,
13 2019, and Chase's lawsuit was filed on October 3rd,
14 2019.

15 But the question is about any conversations
16 before Canal filed its lawsuit on August 17th, 2019,
17 about the fact that Ms. Robinson had threatened legal
18 action.

19 A It was just, like, a gossipy time. I mean
20 like, a lot of people in the building, I don't think
21 liked Chase very much. They were definitely, like, a
22 lot of, oh, my God, like, finally, she's gone.

23 I don't know that it was specific to the
24 threat of legal action. If per those texts with
25 Tiffany, maybe that came in July and August, I still

1 think it was probably just a lot of gossipy talk of,
2 oh, this is unwarranted. Sure, let her try.

3 Q What action did Canal take in response to
4 the news that Ms. Robinson was threatening a lawsuit?

5 MS. LAZZARO: Objection.

6 MR. BENNETT: Objection. It goes directly
7 to a 30(b)(6) topic.

8 Sabrina, if you can answer the question
9 within your own personal knowledge, go ahead.

10 THE WITNESS: Like, what action did Canal
11 take?

12 BY MS. MACMULLIN:

13 Q Yes.

14 A I don't know. Like, just E-mails that I
15 sent Tasch with petty cash and stuff, and like -- I
16 don't -- like stuff like that.

17 BY MS. MACMULLIN:

18 Q After Ms. Robinson threatened a lawsuit, did
19 Canal undertake an investigation into Ms. Robinson?

20 MS. LAZZARO: Objection.

21 MR. BENNETT: Objection. Same -- the same
22 30(b)(6) objection.

23 If you're aware of --

24 THE WITNESS: I thought that Canal --

25 MR. BENNETT: -- based on personal

1 knowledge, you can go ahead.

2 THE WITNESS: Yeah. On personal knowledge,
3 I thought Canal was investigating Ms. Robinson in
4 general for, like, the SkyMiles fraud and over
5 expenses on the corporate card.

6 Like, I think there was, like, a general
7 audit of that. I -- I just can't say if it came
8 directly from their knowledge of the lawsuit or if it
9 was prior. I don't remember.

10 MS. MACMULLIN: Can we just take a
11 five-minute break here and, then, we can be back on
12 the record at 3:43 p.m. Eastern?

13 MR. BENNETT: Can we do 3:45?

14 MS. MACMULLIN: Yes, we can.

15 MR. BENNETT: Okay.

16 MS. MACMULLIN: Yes.

17 MR. BENNETT: All right. Thank you.

18 THE VIDEOGRAPHER: 12:38 and we are going
19 off the record.

20 (Recess.)

21 THE VIDEOGRAPHER: It is 12:47 and we are
22 back on the record.

23 BY MS. MACMULLIN:

24 Q Ms. Weeks-Brittan, at some point, Canal
25 undertook an investigation into Ms. Robinson; is that

1 correct?

2 MS. LAZZARO: Objection.

3 MR. BENNETT: Objection. Goes to the
4 30(b)(6).

5 You can, otherwise, answer based on personal
6 knowledge.

7 MS. MACMULLIN: Greg, the existence of a
8 contemplated 30(b)(6) deposition places no limits on
9 the discoverability of the information that a fact
10 witness can provide.

11 MR. BENNETT: That's fine, but we're going
12 to take the position moving forward since you're
13 asking questions of this witness in -- the questions
14 are phrased such that you're seeking information based
15 on Canal's general knowledge.

16 Ms. Weeks-Brittan is here as a -- as an
17 individual witness, as an employee of Canal, and not
18 as a representative. So we will take the position
19 that the plaintiff has waived any further questions
20 when it comes to the 30(b)(6) deposition as to that
21 particular topic.

22 So Ms. Weeks-Brittan can only testify based
23 on her personal knowledge. You can ask -- you can
24 continue asking the questions, but that will be the
25 defendants' position moving forward.

1 BY MS. MACMULLIN:

2 Q Ms. Weeks-Brittan, please answer my
3 question.

4 A Can you repeat it, please?

5 Q At some point, Canal undertook an
6 investigation into Ms. Robinson; is that correct?

7 MR. BENNETT: Same objection.

8 THE WITNESS: I think so, yeah. Audited the
9 finances and stuff like that.

10 BY MS. MACMULLIN:

11 Q As far as you know, who initiated the
12 investigation into Ms. Robinson?

13 MR. BENNETT: Same objection.

14 You can answer.

15 THE WITNESS: I -- I don't know who directly
16 initiated it.

17 BY MS. MACMULLIN:

18 Q Was it Mr. De Niro who initiated the
19 investigation into Ms. Robinson?

20 A I don't know.

21 MR. BENNETT: Same objection.

22 MS. LAZZARO: Objection.

23 BY MS. MACMULLIN:

24 Q As far as you're aware, did Mr. De Niro
25 direct the investigation into Ms. Robinson?

1 MS. LAZZARO: Objection.

2 THE WITNESS: I'm not aware.

3 BY MS. MACMULLIN:

4 Q Was there anyone else at Canal besides
5 Mr. De Niro who had the authority to direct Canal
6 employees to investigate Ms. Robinson?

7 MR. BENNETT: Objection. Goes to the
8 30(b)(6).

9 If you know personal -- have personal
10 knowledge to respond to that question, Sabrina, go
11 ahead.

12 THE WITNESS: I just don't really understand
13 what you're asking.

14 BY MS. MACMULLIN:

15 Q Tell me all of the individuals with whom
16 you've communicated concerning the investigation into
17 Ms. Robinson.

18 MR. BENNETT: Same objection.

19 THE WITNESS: Everyone I've communicated
20 with in general or, like, at Canal?

21 BY MS. MACMULLIN:

22 Q You can start with everyone you've
23 communicated with at Canal.

24 A I mean, Gillian and I talked about it.

25 Kaplan also talked about the invest -- we talked about

1 the investigation a lot. Tiffany, obviously, talked
2 about it, but isn't at Canal.

3 Bob asked me in that instance, the promotion
4 October talk. We talked about the investigation a
5 lot. Tasch asked me to send, like, those petty cash
6 and timecards stuff; but he's also not at Canal.

7 Q How often did you and Mr. De Niro discuss
8 the investigation?

9 A Not often.

10 MR. BENNETT: Objection.

11 BY MS. MACMULLIN:

12 Q How often did you and Michael Tasch discuss
13 the investigation?

14 A Not often.

15 Q And turning back to Mr. De Niro, when you
16 say -- how often did you discuss the investigation
17 with Mr. De Niro?

18 MR. BENNETT: I think that was asked and
19 answered, but objection.

20 THE WITNESS: Like, probably I can count on
21 one hand. Like, we -- it just wasn't something --
22 like, we addressed it at the time, but -- but Bob's
23 not gossipy at all. It was like said and that we left
24 it at that. Like, I didn't continue to talk to Bob
25 about it.

1 BY MS. MACMULLIN:

2 Q Tell me everything you recall Mr. De Niro
3 saying about the investigation.

4 MS. LAZZARO: Objection.

5 MR. BENNETT: Objection.

6 If that conversation occurred in the
7 course -- in the -- within a meeting that involved
8 Canal's legal counsel, don't answer the question.
9 Otherwise, you can go ahead and answer it.

10 THE WITNESS: Pretty much that time in
11 October that I keep relating to. Maybe when she was
12 actually fired to -- well, I guess, that doesn't have
13 to do with the investigation, just when she left.

14 I think there was a general, like, oh, can
15 you and Gillian handle the office asks? And we really
16 can. We can handle them. And that was that.

17 BY MS. MACMULLIN:

18 Q When Ms. Robinson left town, what did
19 Mr. De Niro say about her departure?

20 MS. LAZZARO: Objection.

21 THE WITNESS: I think I heard from just
22 about everyone besides Bob initially. I think -- I
23 know Chase E-mailed me and Gillian that she was
24 leaving effective immediately.

25 I had wished her luck. I didn't know where

1 she was going yet. I think -- I'm sure Tiffany
2 probably said something, too. I think Kap told us
3 that Chase had left.

4 I didn't speak to Bob about it right away.
5 I think he more just asked if, like, the office could
6 carry on and pick up the slack without her.

7 And Gillian and I said, for sure.

8 BY MS. MACMULLIN:

9 Q What did Mr. -- Mr. De Niro say about
10 Ms. Robinson's departure?

11 MR. BENNETT: Objection.

12 THE WITNESS: I know -- I don't remember if
13 it was this conversation or the October one because it
14 was just so long ago; but I know he was apologetic of
15 how long the bad behavior had been going on from
16 Chase.

17 And Gillian certainly told him that she was
18 unhappy in the office as a result of that. So he
19 apologized to me, saying he didn't realize that Chase
20 was putting that undue pressure on us. And he was, I
21 mean, regretful.

22 He was like, I wish I knew sooner. Now
23 everybody's telling me that they didn't like Chase,
24 but, you know, I didn't realize it at the time. Yeah,
25 I think he was just regretful.

1 BY MS. MACMULLIN:

2 Q And going back to Michael Tasch, how often
3 would you discuss the investigation into Ms. Robinson
4 with Michael Tasch?

5 A It wasn't, like, a discussion of the
6 investigation. That's where I think I'm, like,
7 bumping. Like, he -- he would just, like, ask for
8 things occasionally to be sent, as was like our
9 working relationship.

10 He'd be like, oh, what's the access to this?
11 What's the timecard from this period? Like, we
12 weren't like gossiping. Like, ooh, this happened. I
13 don't have that relationship with him.

14 Q How often were you in communication with
15 Mr. Tasch in regard to the investigation into
16 Ms. Robinson?

17 MR. BENNETT: Objection.

18 You can answer.

19 THE WITNESS: I mean, I speak to Michael
20 probably, like, once a week. And maybe it was closer
21 to, like, two or three times a week, like, in the
22 immediate fallout of this.

23 BY MS. MACMULLIN:

24 Q Beginning -- let me rephrase my question.

25 At what time did it start that you and

1 Mr. Tasch were in touch two to three times a week
2 about the investigation into Ms. Robinson?

3 A See, like, I'm just -- it wasn't, like,
4 specific to an investigation. Like, Michael wasn't
5 like, we're here to discuss the Chase investigation.
6 We just, like, have a normal business working
7 relationship and he'd ask for like something.

8 I -- it's just like -- there's not, like, a
9 quantifiable time in my mind where it was, like, now
10 we're bracketing for an investigation chat with
11 Michael. Like, it wasn't like that at all.

12 Q When did Mr. Tasch -- sorry, you can finish
13 your answer.

14 A I was going to say, I recall, like, over
15 summer in general, like, early, early summer, June,
16 July, focusing a little bit more on, like, an audit of
17 Chase's finances and, like, what was Chase versus what
18 was Bob and Canal.

19 Q Around June or July 2019, Mr. Tasch was
20 requesting materials from you concerning Ms. Robinson?

21 A I think so, but, like, right when she left,
22 we were looking at things as well because we, like,
23 changed a lot of passwords. Like, he canceled her
24 credit card. Like, a lot was done right at the time,
25 so I'm just like having a hard time separating.

1 Like, Gillian and I were largely responsible
2 for, like, changing passwords, changing user names,
3 like, updating everything.

4 Like, Chase had set my own E-mail password
5 for me and, like, my phone password. Like, I changed
6 that stuff immediately after as I'm able to.

7 Like, in my mind, I viewed that whole period
8 following as, like, an investigation into Chase; but I
9 think that's where our definitions aren't matching
10 'cause it wasn't, like, a formal investigation.

11 Q Was there ever a formal investigation into
12 Ms. Robinson?

13 MR. BENNETT: Objection. Goes to the
14 30(b)(6).

15 Subject to that, you can answer based on
16 personal knowledge.

17 THE WITNESS: Yeah, I believe so, but just
18 my problem is, like, it was hard -- I can't pinpoint
19 when it moved from just, like, looking into what she
20 had done versus when it became formal.

21 Like, I -- I know there was a point. I just
22 like -- you'd have to tell me when that was.

23 BY MS. MACMULLIN:

24 Q What was your understanding of when the
25 formal investigation into Ms. Robinson began?

1 A Summer.

2 MR. BENNETT: Same objection.

3 BY MS. MACMULLIN:

4 Q Okay. And I'm sorry, that's summer of 2019?

5 A Summer of 2019.

6 Q What was your understanding of why Canal was
7 investigating Ms. Robinson?

8 MR. BENNETT: Same objection.

9 THE WITNESS: Just my personal understanding
10 was that she had spent beyond the scope. She had
11 spent on personal things. She used the corporate card
12 for her own trips. She paid off a lot of her meals,
13 like her dinners and stuff. I thought that Canal was
14 investigating fraud and theft by Chase.

15 BY MS. MACMULLIN:

16 Q As far as you know, what was the goal in
17 investigating Ms. Robinson?

18 MR. BENNETT: Same objection.

19 THE WITNESS: Just quantifying, like, the
20 dollar value of what she spent that she wasn't
21 authorized to, and time, and money; and, like,
22 vacation days that she got paid back for that she had
23 used.

24 And, like, I just thought we were trying to,
25 like, gain the entire scope of everything she did.

1 BY MS. MACMULLIN:

2 Q Who was involved in investigating
3 Ms. Robinson?

4 MR. BENNETT: Same objection.

5 MS. LAZZARO: Objection.

6 THE WITNESS: Like, at Canal or, like, in
7 general?

8 BY MS. MACMULLIN:

9 Q In general.

10 A I think probably Tasch, Tom, Gillian; me;
11 Michael Kaplan.

12 Q Anyone else?

13 A Then, Greg. I'm not exactly sure when Greg
14 came in, but I know we E-mailed in maybe 2019 or 2020.

15 Q Was Tiffany Chen involved in the
16 investigation of Ms. Robinson?

17 MR. BENNETT: Same objection.

18 THE WITNESS: I don't know. Like, she
19 gossipped about Chase, but I don't think she was,
20 like, formally involved.

21 Tiffany, I think, definitely spotted some of
22 the spending concerns and alerted Bob; but that --
23 that would have been before Chase fired --
24 countersued.

25 I don't -- I mean, I don't know. Maybe

1 Tiffany was doing her own investigation. I'm just --
2 like, again, a just formal investigation versus, like,
3 generally people trying to gauge what Chase did is
4 confusing to me.

5 BY MS. MACMULLIN:

6 Q Based on your understanding, who was in
7 charge of the investigation into Ms. Robinson?

8 MR. BENNETT: Same objection.

9 If you can answer based on personal
10 knowledge, go ahead.

11 THE WITNESS: I thought mainly, like, Tom
12 and Tasch.

13 BY MS. MACMULLIN:

14 Q Who would you say knows the most about the
15 investigation into Ms. Robinson?

16 MR. BENNETT: Same objection.

17 THE WITNESS: Well, now, I feel probably,
18 like, the law firms here. Greg's firm I'm sure
19 everyone's done, like, due diligence.

20 BY MS. MACMULLIN:

21 Q Who at Canal would you say knows the most
22 about the investigation into Ms. Robinson?

23 MR. BENNETT: Same objection.

24 THE WITNESS: I mean, I -- like, I thought I
25 knew a fair amount of the investigation, but now I

1 don't feel that way since I'm confused on general
2 things.

3 So maybe -- I mean, Tom's not picking out,
4 but maybe Tom. Maybe Michael, just having worked with
5 Chase for way longer.

6 BY MS. MACMULLIN:

7 Q And when you say "Michael," are you
8 referring to Michael Tasch or Michael Kaplan?

9 A Yeah. Yeah.

10 MR. BENNETT: Which one was that; Kaplan or
11 Tasch, just for the record?

12 THE WITNESS: Kaplan. I don't think he
13 like -- I -- I'm sure all the lawyers know more now as
14 they prepped, but I think probably at the time Kaplan
15 knew a fair amount.

16 BY MS. MACMULLIN:

17 Q What role did Michael Kaplan play in
18 investigating Ms. Robinson?

19 MR. BENNETT: Same objection.

20 THE WITNESS: I don't know. Like, I'm -- he
21 probably sent stuff for changed passwords and things
22 as well.

23 BY MS. MACMULLIN:

24 Q As far as you know, what role did Michael
25 Kaplan play in investigating Ms. Robinson?

1 MR. BENNETT: Same objection.

2 THE WITNESS: Yeah, that's, like, what I
3 know. I think Kap just helped, like, look through
4 spending and generally try to flag stuff. Like, I
5 think he was helpful where he could be.

6 BY MS. MACMULLIN:

7 Q As far as you know, what role did Gillian
8 Spear play in investigating Ms. Robinson?

9 MR. BENNETT: Same objection.

10 THE WITNESS: As for as I know, like, about
11 the same role that I played. Like, looking through
12 E-mails, sending her own, like, petty cash and
13 E-mails; and, you know, things that.

14 Like, time stamped certain -- like, I -- I
15 think Gillian and I did about the same. And we worked
16 together a lot, so we were, like, talking throughout.

17 BY MS. MACMULLIN:

18 Q What types of documents did Canal employees
19 review in connection with the investigation?

20 MS. LAZZARO: Objection.

21 MR. BENNETT: Same -- same objection.

22 If you have personal knowledge, go ahead and
23 answer the question.

24 THE WITNESS: I reviewed petty cash excels.
25 Chase's, as well. I think we had access to her

1 E-mail.

2 That's how I learned of the fact that she
3 got paid back for all her vacation days when I viewed
4 her as taking vacation.

5 I think Tasch sent us screenshots of like
6 the AMEX bills, and I -- I think I flagged like when
7 Bob was away. And it would have been him at a hotel
8 in London versus Chase at a hotel in London. Like,
9 stuff like that.

10 I cross-referenced our calendar a lot to see
11 where Bob was to go along with where the spending was.

12 BY MS. MACMULLIN:

13 Q Were you the person who came up with the
14 allegation that Ms. Robinson improperly sought
15 reimbursement for vacation days?

16 MR. BENNETT: Same objection.

17 And to the extent that that information came
18 from legal counsel, I will instruct you not to answer,
19 Sabrina.

20 THE WITNESS: I didn't weigh in on anything.
21 I just sent things on. Me now weighing in on it is my
22 own opinion of the fact that she took vacation and got
23 paid back for days that she took.

24 BY MS. MACMULLIN:

25 Q You're not aware of Ms. Robinson's

1 communications with Mr. De Niro concerning vacation
2 day reimbursement; is that correct?

3 A I'm aware only of E-mails that I've since
4 seen where she told Bob she was on vacation. And
5 she'd say, like, I'm going to be in the air. I'll
6 check E-mail when I land, going on vacation, stuff
7 like that.

8 Q As far as you're aware, Ms. Robinson
9 informed Mr. De Niro of her travel plans; correct?

10 MS. LAZZARO: Objection.

11 MR. BENNETT: Objection.

12 THE WITNESS: She informed him of her
13 vacation. I don't think she informed him of her
14 spending or charging the corporate card on those.

15 BY MS. MACMULLIN:

16 Q Besides the E-mails you've reviewed, you're
17 not aware of Ms. Robinson's communications with
18 Mr. De Niro concerning vacation day reimbursement;
19 correct?

20 A Besides what I reviewed, hmm-um. Not aware.

21 Q Did Canal review -- excuse me.

22 Did Canal employees review all of
23 Ms. Robinson's E-mails in connection with the
24 investigation?

25 MR. BENNETT: Goes to the 30(b)(6). I think

1 that goes into work product. So, actually, I will --

2 If you have personal knowledge of -- of
3 that question, Sabrina, go ahead. Otherwise, don't
4 answer the question.

5 THE WITNESS: I definitely wouldn't say all
6 of her E-mails. Gillian and I both made sure we
7 weren't missing anything and monitored the E-mails for
8 a bit to make sure there weren't things going directly
9 to Chase that would cause, like, fallout that our
10 office wasn't handling. We reviewed E-mails of hers.

11 BY MS. MACMULLIN:

12 Q To your knowledge, what specific tasks were
13 Canal employees directed to perform in order to
14 investigate Ms. Robinson?

15 MR. BENNETT: Goes to the 30(b)(6) directly.

16 To the extent you have personal knowledge
17 about an instruction you were given to look for
18 particular things, go ahead.

19 THE WITNESS: Yeah, I was -- I was asked to
20 gather, like, what I -- like, cross-referencing in his
21 calendar where he was against AMEX charges.

22 I put together, like, a general list of his
23 full whereabouts for the last, like, year, I guess, or
24 at least around when Chase departed.

25 I was asked to, like, get bills from

1 vendors. Like, invoices to make sure we had all
2 invoices dated and where they were sent and stuff for,
3 like, flower arrangements; wine; stuff like that.

4 Q And who asked you to gather that info?

5 A Either Tom or Tasch.

6 Q How did it come about that Canal began
7 reviewing the Canal Netflix account in connection with
8 the investigation?

9 MS. LAZZARO: Objection.

10 MR. BENNETT: Same objection for 30(b)(6).

11 Unless that was -- if -- excuse me, if -- if
12 the request came from Attorney Harvey or any other
13 legal counsel on Canal's behalf, I would instruct you
14 not to answer. Otherwise, you can go ahead and answer
15 the question.

16 THE WITNESS: I don't think that I had
17 anything to do with the Netflix. I think that maybe
18 Kaplan alerted someone of it, but I'm not sure. That
19 was my understanding at the time.

20 BY MS. MACMULLIN:

21 Q Do you recall approximately when Mr. Kaplan
22 alerted someone of it?

23 MR. BENNETT: Objection.

24 THE WITNESS: No.

25 MR. BENNETT: You can answer.

1 THE WITNESS: I'm not -- I'm not even
2 100 percent sure that it was Michael. I just -- I
3 wasn't really aware of a company Netflix in general,
4 and then became aware.

5 And then, I saw articles and stuff after
6 that were published, but --

7 BY MS. MACMULLIN:

8 Q What role, if any, did Ms. Chen play in
9 investigating Ms. Robinson?

10 MR. BENNETT: 30(b)(6) objection.

11 Otherwise, you can answer.

12 THE WITNESS: I don't think that she was
13 like part of any formal investigating. I think
14 Tiffany had her speculations and saw some of the
15 spending as it related to their apartment.

16 And I think she flagged some of that
17 spending concerns, but I don't think Tiffany had
18 access to, like, any of Chase's stuff after the fact
19 for formal investigation. I might be wrong, but I
20 don't think she did.

21 BY MS. MACMULLIN:

22 Q At what stage of the investigation did
23 Ms. Chen become involved?

24 MR. BENNETT: Objection.

25 THE WITNESS: I have no idea. I -- I don't

1 know.

2 BY MS. MACMULLIN:

3 Q What role, if any, did a -- did Canal's
4 accountants play in investigating Ms. Robinson?

5 MR. BENNETT: Beyond what she's already
6 testified to? Same objection.

7 THE WITNESS: Yeah, the same things from
8 Tasch, just, like, looking through the AMEX and kind
9 of, like, highlighting what was Bob, and what wasn't
10 type of stuff.

11 BY MS. MACMULLIN:

12 Q And at what stage of the investigation, did
13 Berdon become involved?

14 MR. BENNETT: Same objections.

15 THE WITNESS: I thought it was pretty much
16 right away because right -- there were, like, a bunch
17 of things we needed to change immediately after Chase
18 left since she had set up, like, the passwords to
19 everything and had a credit card.

20 So I thought that Berdon was immediately
21 looking into all of that and making changes.

22 BY MS. MACMULLIN:

23 Q Ms. Weeks-Brittan, I'm not asking about the
24 changing of passwords. I'm asking about the
25 investigation and at what stage Berdon became involved

1 in the investigation into Ms. Robinson.

2 MR. BENNETT: Same objections.

3 THE WITNESS: (Inaudible.)

4 MR. BENNETT: (Inaudible.)

5 (The parties are talking at the same time.)

6 THE WITNESS: I just thought it was right
7 away.

8 THE REPORTER: Hold -- hold on.

9 MR. BENNETT: She's already testified that
10 she's not clear as to where it begins. I mean -- so I
11 don't know how you can ask that question.

12 But go ahead, Sabrina, answer to the
13 extent -- (Inaudible.)

14 (The parties are talking at the same time.)

15 THE WITNESS: I thought that right when
16 Chase left, Tasch was aware that -- of sending
17 concerns. And I -- I thought it was immediate that
18 they started looking into the AMEX charges, but maybe
19 it was closer to early June.

20 MS. LAZZARO: Don't guess.

21 THE WITNESS: I'm guessing. I don't want to
22 guess. Sorry.

23 MR. BENNETT: Don't guess.

24 THE WITNESS: It felt immediate.

25

1 BY MS. MACMULLIN:

2 Q Which Berdon employees played a role in
3 investigating Ms. Robinson?

4 A I don't know beyond Tasch.

5 MR. BENNETT: 30(b)(6) objection.

6 Go ahead.

7 THE WITNESS: I spoke to Tasch.

8 THE REPORTER: Ms. Weeks-Brittan --

9 BY MS. MACMULLIN:

10 Q What role --

11 THE REPORTER: Hold on a second.

12 Ms. Weeks-Brittan, when your attorney makes
13 an objection, you're speaking over him. So I cannot
14 get two people talking at the same time.

15 So if you -- if he does that, I know you're
16 not doing it on purpose, just repeat your answer, so I
17 can get it. Okay? Thanks.

18 THE WITNESS: Okay.

19 MR. BENNETT: Sorry.

20 THE REPORTER: No, it's not -- it's okay.

21 BY MS. MACMULLIN:

22 Q What role, if any, did Tom Harvey play in
23 investigating Ms. Robinson?

24 MR. BENNETT: 30(b)(6) objection.

25 And to the -- don't reveal any information

1 that Attorney Harvey disclosed to you, as it related
2 to any investigation you performed. Otherwise, you
3 can answer.

4 THE WITNESS: I guess, I don't exactly know
5 what that means. Like, a -- if he was disclosing it
6 to me or if he was just asking me something.

7 I guess, I'll -- I might be overstepping,
8 but yeah, like -- like, Tasch, Tom generally asked for
9 a sense of what was Bob spending versus what was
10 Chase's, and why she would have spent something versus
11 another.

12 BY MS. MACMULLIN:

13 Q As far as you know, were any written
14 memoranda or summaries prepared reflecting any
15 findings made during the investigation?

16 MR. BENNETT: 30(b)(6) objection.

17 Otherwise, you can answer.

18 THE WITNESS: Were any written or what?

19 BY MS. MACMULLIN:

20 Q Memoranda or summaries.

21 Were any written memoranda or summaries
22 prepared reflecting any findings made during the
23 investigation?

24 MR. BENNETT: Same objection.

25 THE WITNESS: Like, receipts and stuff or

1 like E-mails? Like, I printed out receipts and
2 E-mails that I felt applied; but I didn't like --

3 BY MS. MACMULLIN:

4 Q I'm talking --

5 A Sorry.

6 Q Were there any written memoranda or
7 summaries prepared that reflected findings that were
8 made during the investigation?

9 MR. BENNETT: Same objection.

10 THE WITNESS: I don't think I'm aware of
11 summaries. Like I said, I printed receipts and travel
12 and calendar clarification stuff that was, like,
13 organized by category of, like, travel expenses;
14 flower expenses; like, Netflix logs.

15 There's not, like, a summary or at -- I
16 don't know. I didn't see a summary. I didn't
17 summarize.

18 BY MS. MACMULLIN:

19 Q So you printed out receipts with respect to
20 flowers?

21 A Yeah, I printed out a lot of receipts off
22 Chase's cards and vendors. And I -- I double-checked
23 invoices and stuff.

24 Q What other categories of receipts did you
25 print out?

1 MR. BENNETT: When is this?

2 MS. MACMULLIN: During the investigation
3 into Ms. Robinson.

4 THE WITNESS: I printed, like, Netflix logs,
5 like, user data, like, what was watched; and where the
6 location pinged.

7 I printed out E-mails, like, saying I'm on
8 vacation. I printed out, like, trips. I think, like,
9 maybe some tickets. Just general, like, calendar
10 dates of where Chase was, where Bob was.

11 BY MS. MACMULLIN:

12 Q Is there anything else you recall printing
13 out?

14 A Oh, maybe Ubers. Oh, restaurant receipts,
15 too.

16 Q Did the records you accessed from Netflix
17 state the times that the Netflix shows were accessed?

18 A I think so, but I have not looked in years.

19 Q Were you the person responsible for
20 calculating the amounts that Canal claimed to be
21 seeking in its lawsuit against Ms. Robinson?

22 MS. LAZZARO: Objection.

23 MR. BENNETT: 30(b)(6) objection.

24 You can answer.

25 THE WITNESS: No.

1 BY MS. MACMULLIN:

2 Q As far as you know, were there any aspects
3 of Ms. Robinson's conduct that were investigated and
4 where a conclusion was reached that there hadn't been
5 any wrongdoing?

6 MR. BENNETT: 30(b)(6) objection and
7 objection to the form.

8 You can answer.

9 THE WITNESS: No. I thought the general
10 consensus was that there had been wrongdoing, but
11 I'm not trying to say, like, every single thing.
12 Like, I'm sure there were, like, an Uber to work that
13 was valid. Like, a flight for Bob that was valid; but
14 overall, the consensus was, there was wrongdoing.

15 BY MS. MACMULLIN:

16 Q How did Canal employees react to the fact
17 that Ms. Robinson was being investigated?

18 MR. BENNETT: Objection.

19 THE WITNESS: Gillian and I were happy.
20 Kaplan was amused. Beyond that, I can't say what they
21 felt.

22 BY MS. MACMULLIN:

23 Q Why were you happy?

24 A Chase made the job so much worse and
25 stressful, and strange; and nervous pressure. It was

1 really hard to work with her. And Gillian more so
2 than I beared the brunt of it.

3 But it -- it was a very tense, not warm
4 environment before. There was no flexibility or
5 understanding if things came up, which was very
6 stressful. It was like a -- I felt chained to my desk
7 by Chase.

8 Post Chase, aside from the pandemic, we
9 established a much more comfortable remote way of
10 doing things. If Bob was out of town, the assistants
11 could be home, too, as long as someone was on the
12 phone. That was not the case before. She required us
13 to be in the office.

14 Like I said, that Thanksgiving, I almost
15 couldn't get back to New York. And I showed up -- I
16 got to New York at three-something a.m. I asked her
17 if I could open the work door at 10:00 a.m. And she
18 wrote, "9:30 period."

19 I was there at 9:30. And she called my desk
20 at 9:30 to make sure I got there. Like, that was an
21 immense amount of pressure.

22 And all Bob cares about is just the job is
23 done and you answer your phone. He doesn't care where
24 you are. He didn't care that I was there the Monday
25 after Thanksgiving. He wasn't in town. It -- it was

1 just very stressful and rigid when it didn't need to
2 be.

3 BY MS. MACMULLIN:

4 Q What, if anything, did Mr. Kaplan express to
5 you about why he was amused that Ms. Robinson was
6 being investigated?

7 MS. LAZZARO: Objection.

8 THE WITNESS: I don't know. I think maybe
9 ask Kap, but I think their -- they had a -- like, a
10 longer working relationship.

11 And I think, from my experience, Chase was
12 pretty mean and demanding of Michael as well. So
13 while she respected him a bit more than she respected
14 me and Gillian, and she didn't refer to Michael as
15 "the girls" or anything demeaning, I think that he
16 felt put down by her.

17 And she'd ask him to run errands. And they
18 started around the same time. That probably doesn't
19 feel great.

20 BY MS. MACMULLIN:

21 Q To your knowledge, were any other Canal
22 employees investigated?

23 A Like, what do you mean? In this type of
24 formal --

25 MS. LAZZARO: Can you define the time

1 period?

2 BY MS. MACMULLIN:

3 Q At any point after Ms. Robinson's employment
4 ended, were any other Canal employees investigated, to
5 your knowledge?

6 MR. BENNETT: Objection. Object -- I'm
7 sorry. I didn't mean to interrupt, Kate. Objection.
8 You can answer.

9 THE WITNESS: I don't think, like, formally
10 investigated. I think, generally, there was talk of
11 whether or not Kaplan was doing enough or pulling his
12 weight post Chase. And he's a great guy.

13 He's not the most organized or best worker,
14 and I think there was a sense that he was lazy and not
15 totally doing everything that was asked of him; but
16 not any, like, investigation investigation.

17 BY MS. MACMULLIN:

18 Q To your knowledge, after Ms. Robinson's
19 employment ended, was anyone other than Ms. Robinson
20 accused of stealing?

21 MR. BENNETT: Objection.

22 You can answer.

23 THE WITNESS: Maybe Kap. Maybe Kap, to my
24 knowledge, but I don't think a lot was investigated.

25

1 BY MS. MACMULLIN:

2 Q By whom was he accused of stealing?

3 A I think Bob maybe asked him. Maybe Tiffany
4 told Bob, but I -- I'm speculating a lot here.

5 BY MS. MACMULLIN:

6 Q What, if anything, was Mr. Kaplan accused of
7 stealing?

8 A I don't know. Maybe dinners or Uber. I'm
9 not sure.

10 Q Was Mr. Kaplan accused of improperly
11 receiving reimbursement for vacation days?

12 A No.

13 MR. BENNETT: Objection.

14 THE WITNESS: I don't think so. I think
15 Chase submitted days that Kaplan used or didn't use to
16 Tasch.

17 And post -- post Chase, I don't think anyone
18 gets reimbursed for vacation days that -- unused
19 vacation days, I mean. I -- I don't think that's a
20 thing. That seemed to only apply to Chase and Michael
21 at the time.

22 BY MS. MACMULLIN:

23 Q To your knowledge, was Michael Kaplan
24 required to return any funds to Canal?

25 A I have no idea.

1 Q To your knowledge, was Mr. Kaplan
2 disciplined in any way in connection with any
3 accusations of stealing?

4 MS. LAZZARO: Objection.

5 THE WITNESS: I have no idea. I mean, he
6 was, like, phased down, but I think he -- to my
7 knowledge, he left in -- on fairly good terms.

8 It was more of a, you know, you're not doing
9 as much for me as maybe you should have been or, like,
10 could have been doing and is this really the right job
11 for you now? Like, what -- what are you doing here?

12 BY MS. MACMULLIN:

13 Q To your knowledge, was Robin Chambers
14 accused of stealing?

15 A I don't know. I don't think so.

16 Q Are you aware of Ms. Chen making false
17 accusations against Canal employees?

18 MS. LAZZARO: Objection.

19 THE WITNESS: I don't know if I can say
20 false. I think Tiffany makes a lot of claims, but I
21 can't say she wasn't necessarily wrong about Chase.

22 BY MS. MACMULLIN:

23 Q What kinds of claims has Ms. Chen made about
24 Canal employees?

25 MR. BENNETT: Objection.

1 You can answer.

2 THE WITNESS: I mean, she claimed that Chase
3 was stealing.

4 Like, just the claims, I said that -- I
5 guess the one that I personally view as false is I
6 think she claimed that Chase was in love with Bob or
7 wanted his approval/validation. I didn't witness
8 that. So I can't say one way or the other.

9 I mean, she claimed that Kaplan was lazy and
10 not great at his job. Michael may admit to,
11 occasionally, being lazy. I don't think that's a
12 false claim. Was she harsh in saying that? Probably,
13 but --

14 BY MS. MACMULLIN:

15 Q To your knowledge, what claims has Ms. Chen
16 made against other Canal employees other than those
17 that you've just described?

18 MS. LAZZARO: Objection.

19 THE WITNESS: I mean, I don't really know.
20 Like, if you're pointing to something you want to ask
21 me, but I think she and Gillian got along fine.

22 I think she probably claimed that Lulu
23 wasn't needed and was, like, a young kid out of
24 college. And, then, Lulu was subsequently let go when
25 Chase left because she worked for Chase.

1 BY MS. MACMULLIN:

2 Q To your knowledge, has Mr. De Niro been
3 aware that any of the accusations Ms. Chen has made
4 were false?

5 MR. BENNETT: Objection.

6 THE WITNESS: What are you saying was false?

7 BY MS. MACMULLIN:

8 Q Based on your prior testimony, I'm asking
9 whether Mr. De Niro was aware that any accusations
10 Ms. Chen was making were false?

11 A I'm asking which -- because I -- my
12 testimony, I don't really think they were false.
13 Maybe the being in love with him, but that was
14 Tiffany's personal feeling, I think, of Chase being in
15 their home. It could have been wrong, but you can't,
16 like, unequivocally say that's false.

17 Q Did there come a time when you became aware
18 of Mr. De Niro's plan to file a lawsuit against
19 Ms. Robinson?

20 MR. BENNETT: Objection.

21 MS. LAZZARO: Objection.

22 MR. BENNETT: We went through this.

23 THE WITNESS: Yeah. I mean, you gave me the
24 dates that the lawsuits were filed and the text of
25 Tiffany telling us in July.

1 BY MS. MACMULLIN:

2 Q Did there come a time when you became aware
3 of Mr. De Niro's plan to file a lawsuit against
4 Ms. Robinson?

5 MS. LAZZARO: Objection.

6 MR. BENNETT: Objection.

7 THE WITNESS: Similar to what I said before,
8 but I thought the stuff that I was putting together
9 and asked to flag on the AMEXes, like, early in when
10 Chase left, I thought that that might be used in a
11 lawsuit; but I also thought that Tasch was auditing
12 spending and properly looking into valid concerns.

13 I -- I'm just like -- I don't know when it
14 moved to formal investigation, but I was aware that
15 people were investigating Chase's spending for sure.

16 BY MS. MACMULLIN:

17 Q Do you recall a time when you became aware
18 of a plan to file a lawsuit against Ms. Robinson?

19 MS. LAZZARO: Objection.

20 MR. BENNETT: Objection.

21 THE WITNESS: I definitely became aware
22 there was a lawsuit. I just -- it was, like, very
23 dramatic period of time. And, like, I don't
24 remember -- it wasn't like it was quiet and then
25 suddenly, someone was like we're filing a lawsuit.

1 Like, there was a lot of gossip surrounding
2 Chase's exit in general and a lot of things were being
3 looked into. So it's just, like, hard for me to
4 pinpoint when I became aware exactly.

5 BY MS. MACMULLIN:

6 Q What made it a dramatic period of time?

7 A I mean, Chase -- like I said, I think a lot
8 of people who have worked for Chase and for Bob had
9 terrible interactions with Chase. There was, like,
10 literally a party thrown when she quit.

11 Like, heads of the company came to
12 assistants that are, like, well into their adult lives
13 doing high-powered jobs showed up. Like, people
14 celebrated it. So it was a dramatic time.

15 Chase worked there for over a decade. She
16 rubbed a lot of people the wrong way. People were
17 happy.

18 And as a result, there was a lot of drama
19 surrounding it when it came to light that there were a
20 lot of things that were question marks in terms of her
21 spending and her travel. People were happy about
22 that, frankly.

23 BY MS. MACMULLIN:

24 Q Tell me everyone who celebrated
25 Ms. Robinson's departure from Canal.

1 MR. BENNETT: Objection.

2 You can answer.

3 THE WITNESS: Well, that E-mail chain that
4 I'm sure you have would help because there were people
5 who I never worked with who came.

6 But like directly, me, Gillian, Morgan, the
7 assistant that predated me; Kaplan; Jane Rosenthal;
8 Berry Welsh; and then like a lot of the assistants in
9 previous years. I would need to reference that E-mail
10 to know.

11 BY MS. MACMULLIN:

12 Q Which assistants from previous years
13 celebrated Ms. Robinson's departure other than Morgan
14 Billington?

15 A I honestly don't remember many of their
16 names. I would have to look back. I feel like there
17 is a Katherine.

18 Q Katherine Renett (phonetic).

19 A Probably, yeah. I would just need to look
20 at the E-mail.

21 Q As far as you know, how did Canal come up
22 with the allegations that it put in the lawsuit that
23 it filed against Ms. Robinson?

24 MS. LAZZARO: Objection.

25 MR. BENNETT: Objection.

1 THE WITNESS: As far as I know, they just
2 looked at the spending and the E-mails, and drew
3 conclusions.

4 BY MS. MACMULLIN:

5 Q What role did Mr. De Niro play in developing
6 the allegations in the lawsuit against Ms. Robinson?

7 MR. BENNETT: Objection.

8 THE WITNESS: I have no idea what he spoke
9 to the lawyers about.

10 BY MS. MACMULLIN:

11 Q Did he ever speak to you about the
12 allegations in the lawsuit?

13 A Not beyond what I've mentioned, just like he
14 apologized for her poor treatment and general like I
15 trust people until they break my trust type of stuff.

16 Q What role, if any, did Canal -- Canal's
17 accountants play in developing the allegations in the
18 lawsuit against Ms. Robinson?

19 MS. LAZZARO: Objection.

20 MR. BENNETT: Objection.

21 THE WITNESS: Like I said, I sent receipts
22 and stuff to Tasch. I have no idea what -- with it
23 what he did.

24 BY MS. MACMULLIN:

25 Q What role, if any, did Ms. Chen play in

1 developing the allegations in the lawsuit against
2 Ms. Robinson?

3 MS. LAZZARO: Objection.

4 THE WITNESS: I have no idea beyond what
5 I've said of, like, things that she gossiped on or
6 things that she's flagged.

7 I don't believe she had a hand in any of the
8 formal investigative stuff, but I'm not sure.

9 BY MS. MACMULLIN:

10 Q Were there any discussions about the timing
11 of filing the lawsuit against Ms. Robinson?

12 MR. BENNETT: Objection. That you were --

13 THE WITNESS: None that I was aware of.

14 MR. BENNETT: Objection.

15 BY MS. MACMULLIN:

16 Q As far as you know, what was Mr. De Niro
17 hoping to achieve in bringing the lawsuit against
18 Ms. Robinson?

19 MR. BENNETT: Objection.

20 MS. LAZZARO: Object.

21 THE WITNESS: I can't say what he was hoping
22 to achieve. I don't know how he felt. My
23 understanding of the lawsuit was just to get back on
24 what was owed and what was stolen.

25

1 BY MS. MACMULLIN:

2 Q Nothing that you had reviewed indicated that
3 Ms. Robinson had stolen millions of dollars; is that
4 correct?

5 MR. BENNETT: Objection.

6 MS. LAZZARO: Objection.

7 THE WITNESS: I disagree.

8 BY MS. MACMULLIN:

9 Q Please explain what you mean by that.

10 A I looked over her AMEX charges and flights
11 and stuff. And it seemed to me, like, a lot of her
12 spending was personal and not business spending.

13 Q But nothing you reviewed indicated that
14 Ms. Robinson had stolen millions of dollars; isn't
15 that right?

16 MR. BENNETT: Objection.

17 THE WITNESS: She spent a lot of money on
18 the corporate cards. Some of the spending was for
19 Bob. Some of the spending was for Chase.

20 I didn't, like, take a calculator and add up
21 an amount; but it seemed to me that over 10 years, she
22 charged quite a few things that were personal for
23 herself and trips that cost thousands and thousands of
24 dollars.

25 So I didn't hear that number and think it

1 was a crazy number. I didn't come up with it myself,
2 but it seems to me in line with the spending that I
3 saw.

4 BY MS. MACMULLIN:

5 Q Did anyone take a calculator and calculate
6 that she stole millions of dollars?

7 MS. LAZZARO: Objection.

8 MR. BENNETT: 30(b)(6) objection.

9 You can answer based on personal knowledge.

10 THE WITNESS: How would I know that I --

11 BY MS. MACMULLIN:

12 Q So you don't know whether anyone took a
13 calculator and calculated that she stolen millions of
14 dollars?

15 MR. BENNETT: Objection.

16 MS. LAZZARO: Objection. Asked and
17 answered.

18 THE WITNESS: I would guess that
19 accountants did.

20 MR. BENNETT: Don't guess.

21 THE WITNESS: Okay. Then, I -- I have no
22 firsthand knowledge of it.

23 BY MS. MACMULLIN:

24 Q Did you ever see a calculation that
25 Ms. Robinson stole over \$1 million?

1 MS. LAZZARO: Objection.

2 MR. BENNETT: Objection. Objection.

3 If information was provided to you by
4 Attorney Harvey on behalf of Canal, I will recommend
5 that you not answer the question. Otherwise, you can
6 answer.

7 THE WITNESS: I think combined with her
8 spending that I saw, vacation days that were paid
9 back, her way higher salary than what called for;
10 given she wasn't replaced; and a number of other
11 things; time wasted I think over 10 years, in my mind
12 does amount to some million dollars.

13 I never was given anything by anyone that
14 could properly quantify everything, but from me
15 looking through it directly, I -- I feel there was a
16 lot of time misuse; a lot of credit card misuse.

17 BY MS. MACMULLIN:

18 Q I'm not asking you to speculate. I'm asking
19 whether you ever saw a calculation that indicated that
20 Ms. Robinson stole over \$1 million?

21 MS. LAZZARO: Objection.

22 MR. BENNETT: Same objections.

23 THE WITNESS: I feel I've spoken to that,
24 but I also think the theft involved more than the
25 stealing of money and also the stealing of time.

1 BY MS. MACMULLIN:

2 Q It's really a yes or no question about
3 whether you -- you've ever seen a calculation that
4 broke down and supported the fact that Ms. Robinson
5 stole over \$1 million.

6 MR. BENNETT: I think the witness has
7 answered the question.

8 But, Sabrina, go ahead if you'd like to
9 respond again.

10 THE WITNESS: I don't think so beyond my own
11 calculations as I went, not formal written summaries
12 or with calculators.

13 BY MS. MACMULLIN:

14 Q As far as you know, how did Canal come up
15 with the allegation that Ms. Robinson charged hundreds
16 of thousands of dollars in personal expenses on
17 Canal's American Express card?

18 MS. LAZZARO: Objection.

19 MR. BENNETT: Objection.

20 Don't reveal any information that was
21 conveyed to you by legal counsel.

22 THE WITNESS: From looking at her American
23 Express card and flagging what was charged by Bob,
24 what was correctly charged by Chase; and what was
25 incorrectly charged by Chase.

1 BY MS. MACMULLIN:

2 Q Were any other documents reviewed besides
3 the AMEX bills and E-mails in support of that
4 allegation?

5 MR. BENNETT: Which allegation?

6 MS. MACMULLIN: The allegation that
7 Ms. Robinson charged hundreds of thousands of dollars
8 in personal expenses on Canal's American Express card.

9 MR. BENNETT: Okay. 30(b)(6) objection.
10 You can, otherwise, answer.

11 THE WITNESS: I think I saw a petty cash
12 sheet that she had that charged for a Louis Vuitton
13 bag and the laptop, flower expenses; invoices from
14 other places beyond the credit card.

15 BY MS. MACMULLIN:

16 Q What documents were reviewed to prepare the
17 compilation of Uber expenses that Canal accused
18 Ms. Robinson of improperly charging?

19 MR. BENNETT: Objection.

20 THE WITNESS: Gillian and I had --

21 MR. BENNETT: When --

22 THE WITNESS: -- looked at Uber charges.
23 Should I keep going?

24 BY MS. MACMULLIN:

25 Q What documents --

1 MR. BENNETT: I'm not clear as to what the
2 question was.

3 MS. MACMULLIN: I'll rephrase the question.

4 BY MS. MACMULLIN:

5 Q What documents were reviewed to prepare the
6 compilation of Uber expenses that Canal accused
7 Ms. Robinson of improperly charging?

8 MR. BENNETT: In the Complaint?

9 MS. MACMULLIN: Yes.

10 MR. BENNETT: Objection.

11 If -- if you have personal knowledge
12 independent of any information conveyed to you
13 outside -- from someone other than Canal's legal
14 counsel, you can answer.

15 THE WITNESS: I have no idea what was put in
16 the Complaint, but I know that I looked at her Uber
17 charges and flagged if any were to and from the
18 office; if any were around Bob's apartment for
19 apartment stuff; and when they were just separate
20 unrelated Uber charges.

21 BY MS. MACMULLIN:

22 Q And when you say that you looked at her Uber
23 charges, what documents were you reviewing?

24 MR. BENNETT: Objection.

25 THE WITNESS: Like, the date and time stamp,

1 I think, of the Ubers on the AMEX bill, and, like,
2 where they were taken from; where the rides were.

3 BY MS. MACMULLIN:

4 Q The AMEX bill didn't show the location of
5 the Uber rides; is that correct?

6 A I don't think so.

7 MR. BENNETT: Objection.

8 THE WITNESS: I think it was probably the
9 Uber account that showed that; like an invoice that
10 was sent to, like, maybe receipts at
11 canalproductions.com. It sends you a summary of your
12 ride.

13 BY MS. MACMULLIN:

14 Q You didn't have access to Ms. Robinson's
15 personal Uber receipts; did you?

16 MR. BENNETT: Objection.

17 THE WITNESS: Just the personal ones she
18 took on the corporate card.

19 BY MS. MACMULLIN:

20 Q As far as you know, how did Canal come up
21 with the allegation that Ms. Robinson used and
22 converted millions of Canal's frequent flyer miles for
23 her personal use?

24 MR. BENNETT: Objection. I think she's
25 already testified she has no idea about anything in

1 the Complaint.

2 But go ahead. If you have independent
3 knowledge, you can answer the question.

4 THE WITNESS: Like I said, I was unaware of
5 SkyMiles being a thing at all. I want to say maybe
6 Kaplan looked into that.

7 I don't think that Bob has much of an
8 understanding of how you can convert AMEX points into
9 anything. He's not wildly tech savvy.

10 I -- after Chase left, I became aware that
11 SkyMiles had been transferred to her. I don't -- I
12 don't know why or why I wasn't privy to any of those
13 conversations.

14 BY MS. MACMULLIN:

15 Q Okay. So you're not aware of how Canal came
16 up with the allegation that Ms. Robinson used and
17 converted millions of Canal's frequent flyer miles for
18 her personal use?

19 MS. LAZZARO: Objection.

20 THE WITNESS: My -- I think they came up
21 for -- by looking at the SkyMiles transfer. And I
22 think that Michael Kaplan alerted them or found that.

23 BY MS. MACMULLIN:

24 Q As far as you know, how did Canal come up
25 with the allegation that Ms. Robinson reimbursed

1 herself from Canal's petty cash account for personal
2 and luxury items?

3 MR. BENNETT: Objection.

4 THE WITNESS: As far as I know, there were
5 certain petty cash Excel sheets submitted that showed
6 the spending of those things and the reimbursement.

7 BY MS. MACMULLIN:

8 Q As far as you know, how did Canal come up
9 with the allegation that Ms. Robinson submitted false
10 information in order to be paid for unused vacation
11 time?

12 MR. BENNETT: Objection.

13 THE WITNESS: I saw an E-mail to Tasch year
14 after year saying she used zero vacation days. And I
15 saw other E-mails Chase saying I'm going on vacation.

16 In fact, when I was hired, she was going on
17 vacation and I heard from her the following week. I
18 was aware of when Chase went on vacation. And then I
19 saw that she submitted zero days for vacation for the
20 year.

21 BY MS. MACMULLIN:

22 Q You weren't aware of all the work that
23 Ms. Robinson performed while she was away from
24 New York; is that right?

25 A Now, that I've seen into her E-mail, I have

1 more of a sense of it.

2 Q So you're aware of all the work that
3 Ms. Robinson performed while she was away from
4 New York?

5 A I didn't say that. I have more of a sense
6 of it now that I've seen E-mails that she sent, but
7 prior to that, no.

8 Q So you weren't a --

9 MS. LAZZARO: I'm sorry to interrupt. Can
10 you specify what time away from New York that you're
11 specifically speaking about?

12 MS. MACMULLIN: I'm talking about the time
13 period that is at issue in Canal's lawsuit concerning
14 Ms. Robinson's seeking reimbursement for unused
15 vacation days.

16 MS. LAZZARO: Can you identify the time
17 period for Sabrina?

18 MS. MACMULLIN: I can do so after a break.
19 BY MS. MACMULLIN:

20 Q As far as you know, how did Canal come up
21 with the allegation that Ms. Robinson was binge
22 watching Netflix?

23 MR. BENNETT: Objection.

24 THE WITNESS: I mentioned all I know on
25 that, which I think maybe was Michael Kaplan and then

1 later seeing Netflix.

2 BY MS. MACMULLIN:

3 Q From Ms. Robinson's E-mails, you're aware
4 that Ms. Robinson performed work for Mr. De Niro while
5 she was away from New York; isn't that right?

6 MS. LAZZARO: Objection.

7 THE WITNESS: Correct. As I occasionally
8 respond to E-mails when I'm on vacation as well, but
9 it's still a vacation day for me, and I don't seek
10 reimbursement for it. I'm just doing my job.

11 BY MS. MACMULLIN:

12 Q As far as you know, was anyone uncomfortable
13 with the plan to file a lawsuit against Ms. Robinson?

14 MR. BENNETT: Objection.

15 MS. LAZZARO: Objection.

16 THE WITNESS: As far as I know, no.

17 BY MS. MACMULLIN:

18 Q As far as you know, did anyone raise any
19 questions about the plan to file a lawsuit against
20 Ms. Robinson?

21 MR. BENNETT: Objection.

22 MS. LAZZARO: Objection.

23 THE WITNESS: As far as I know, no.

24 BY MS. MACMULLIN:

25 Q As far as you know, did anyone express

1 reluctance about the plan to file a lawsuit against
2 Ms. Robinson?

3 MS. LAZZARO: Objection.

4 MR. BENNETT: Objection.

5 THE WITNESS: I don't think they expressed
6 it to me. I didn't -- I don't think I heard of any.

7 BY MS. MACMULLIN:

8 Q What was your reaction to learning that
9 Mr. De Niro had filed a lawsuit against Ms. Robinson?

10 MR. BENNETT: We covered that. Objection.

11 THE WITNESS: At the time and still now, I
12 thought it was warranted, and he was trying to get
13 back what was owed to him.

14 BY MS. MACMULLIN:

15 Q As far as you know, was a media strategy
16 devised before bringing litigation against
17 Ms. Robinson?

18 MR. BENNETT: Objection.

19 THE WITNESS: If there was, I was not any
20 part of it. So I can't say. I have no idea.

21 BY MS. MACMULLIN:

22 Q Do you have any knowledge at all about what
23 Canal's media strategy was, if any, concerning the
24 lawsuit?

25 MS. LAZZARO: Objection.

1 MR. BENNETT: Just clarify, that's the Canal
2 lawsuit, Kate?

3 MS. MACMULLIN: Yes.

4 MR. BENNETT: Objection.

5 You can answer.

6 THE WITNESS: I didn't think there was a
7 media strategy or I'm not aware of one.

8 BY MS. MACMULLIN:

9 Q Are you of -- are you aware of anyone who
10 was involved in reaching out to the media with respect
11 to Canal's lawsuit against Ms. Robinson?

12 MR. BENNETT: Objection.

13 THE WITNESS: I would guess maybe Bob's
14 publicist would handle it.

15 MS. LAZZARO: Don't guess.

16 THE WITNESS: I don't -- nothing. I'm just
17 guessing at the appropriate person that would seem to
18 handle that, but I have no idea.

19 MS. LAZZARO: Don't guess.

20 BY MS. MACMULLIN:

21 Q And who is Bob's publicist?

22 A Stan Rosenfield.

23 Q Did you ever discuss with Mr. De Niro any of
24 the media coverage of his lawsuit against
25 Ms. Robinson?

1 A No.

2 MS. LAZZARO: Objection.

3 MS. MACMULLIN: I think now is a good time
4 for a break. So maybe we can come back at 5:10.

5 MR. BENNETT: Works for me.

6 MS. MACMULLIN: Great. Thank you.

7 THE VIDEOGRAPHER: It is 1:58 and we're
8 going off the record.

9 (Recess.)

10 THE VIDEOGRAPHER: All right. It is 2:12
11 and we are back on the record.

12 BY MS. MACMULLIN:

13 Q So, Ms. Weeks-Brittan, before the break, we
14 were discussing your review of Ms. Robinson's Uber
15 charges.

16 And I wanted to -- did you cross-reference
17 each charge -- each Uber charge on the American
18 Express bill against an Uber receipt?

19 MR. BENNETT: Objection.

20 You can answer.

21 THE WITNESS: I think so. I haven't looked
22 back on any of this in years, though. So I'd have to
23 double-check.

24 BY MS. MACMULLIN:

25 Q Where were the Uber receipts found?

1 A In E-mail.

2 Q What E-mail address did the Uber receipts go
3 to?

4 A I think either Chase's Canal E-mail or the
5 receipts@canalproductions E-mail that we have, that we
6 had receipts sent to.

7 Q So any Uber receipts that you reviewed would
8 have been found in one of those two accounts?

9 A I think so. There's another random E-mail
10 canal@canalproductions sometimes captured receipts;
11 but definitely, an @canal E-mail, yeah.

12 Q And, Ms. Weeks-Brittan, I'm just going to
13 just turn your attention back for a moment to one of
14 the exhibits that I marked prior to the deposition,
15 which was the second exhibit. It's Bates stamped
16 CANAL0 -- CANAL_0047395.

17 A Um-hmm.

18 Q It should still be in the chat. So let me
19 know if you're able to get it up.

20 A Yeah, I have it.

21 Q Okay. Great. So if you can turn to Page 7
22 of that document.

23 A Um-hmm.

24 Q And you were messaged at 4:16 p.m., which
25 says -- if you can just read the second line of that

1 message, please.

2 A "We can't have a hostile
3 workplace where she decides who to
4 trust one week and then switches
5 the next. Makes us all beyond
6 stressed."

7 Q Why did you perceive the workplace at Canal
8 to be hostile?

9 MR. BENNETT: Objection.
10 You can answer.

11 THE WITNESS: I don't remember what exactly
12 that was in relation to, but I think post Chase,
13 Tiffany was validated in her paranoia and was very,
14 like, stressful in general to making sure that none of
15 the same stuff was still happening. She tried to
16 involve herself in the office much more after that.

17 And then, thankfully, had to take a step
18 back and wasn't really allowed, like, within the
19 office and kind of have a sense of -- she became less
20 involved in, like, what Gillian and I were doing
21 day-to-day. I think she momentarily tried to involve
22 herself more after Chase in an effort to sniff out
23 more of this.

24 BY MS. MACMULLIN:

25 Q About what kinds of things would Ms. Chen be

1 paranoid?

2 A Well, said, how she momentarily, I think,
3 thought that Kap was maybe also being lazy and
4 stealing resources.

5 She, I think, maybe felt validated that
6 Chase was caught and then wanted to make sure she was
7 of use and catching similar things. So she became,
8 like, momentarily way, too, involved, and it was
9 stressful.

10 And thankfully, she wasn't allowed to remain
11 involved in the office. And she's not an employee and
12 she shouldn't be involved in managing me in any way or
13 Gillian. So that certainly helped.

14 Q What, if anything, did Mr. De Niro do that
15 contributed to the hostile workplace?

16 MR. BENNETT: Objection.

17 You can answer.

18 THE WITNESS: I don't feel like he added to
19 any hostility. I felt the hostility came externally
20 either from Chase or from Gillian -- sorry, not
21 Gillian, from Tiffany.

22 BY MS. MACMULLIN:

23 Q What, if anything, did Mr. De Niro allow
24 Ms. Chen to do that contributed to the hostile
25 workplace?

1 MR. BENNETT: Objection.

2 THE WITNESS: I don't really think he
3 allowed her to do anything. I think it was a weird
4 like -- like, how I mentioned, it's kind of a strange
5 job when you, like, have to also help out, like,
6 peripheral, like, a girlfriend of your boss.

7 It's weird that would fall into
8 expectations, but occasionally it does. Like, if
9 they're traveling and I need to order catering for
10 her.

11 I think it was kind of weird growing pains
12 of when she finally, like, met us in the office and
13 became a little bit more public facing with Bob.

14 I think that she tried to kind of, like, you
15 know, have a -- have a handle on the office and have a
16 handle on the house; and make sure that she was
17 running things smoothly. And I think she got pushed
18 back and realized like, hey, you don't get to have a
19 handle on the office. You can handle the house all
20 you want, but don't overstep. And I'm glad those
21 boundaries were set.

22 BY MS. MACMULLIN:

23 Q Did there come a time when you became aware
24 that the Manhattan District Attorney's Office was
25 contacted about Canal's claims against Ms. Robinson?

1 MS. LAZZARO: Objection.

2 THE WITNESS: I'm, like, vaguely aware that
3 both claims were filed in different courts. I'm not
4 sure which was filed with Manhattan. So, like, I'm
5 not sure exactly what you're talking about.

6 BY MS. MACMULLIN:

7 Q Do you -- do you recall when you became
8 aware that any kind of contact had been made to the
9 Manhattan District Attorney's Office by someone at
10 Canal about claims against Ms. Robinson?

11 A Like, are you saying, like, maybe when Canal
12 submitted their suit?

13 Q I'm asking about Canal contacting the
14 Manhattan District Attorney, not the civil lawsuit
15 that was filed by Canal.

16 MS. LAZZARO: Objection --

17 MR. BENNETT: Objection.

18 MS. LAZZARO: -- to the extent that it
19 covers the 30(b)(6) topics.

20 THE WITNESS: Yeah, I don't know what you're
21 referring to.

22 BY MS. MACMULLIN:

23 Q Do you know what the Manhattan District
24 Attorney's Office is?

25 A Yes, but I don't know how it relates to this

1 or where everything was filed by Bob or by Chase.

2 Q The Manhattan District Attorney's Office
3 handles criminal prosecutions; is that correct?

4 MR. BENNETT: Objection.

5 THE WITNESS: If you're telling me it's
6 correct, then sure.

7 BY MS. MACMULLIN:

8 Q Were you aware that Canal contacted the
9 Manhattan District Attorney's Office with claims
10 against Ms. Robinson?

11 MR. BENNETT: I think that's been asked and
12 answered; but objection.

13 You can answer, if you understand.

14 THE WITNESS: I'm not aware that Canal
15 contacted them. I don't know how that worked
16 linearly, who contacted who, how that happened.

17 BY MS. MACMULLIN:

18 Q You're aware of Canal being in talks with
19 the Manhattan District Attorney's Office?

20 MR. BENNETT: Objection. That wasn't her
21 testimony.

22 You can answer.

23 THE WITNESS: I think so, but I guess I'm
24 just not aware of how this differs from where Bob's
25 suit was filed.

1 BY MS. MACMULLIN:

2 Q Are you aware of Canal seeking to have
3 Ms. Robinson criminally prosecuted?

4 A Yeah, I think so. It's where the suit was
5 filed; right?

6 Q The lawsuit filed against Ms. Robinson in
7 New York State Supreme Court is a civil lawsuit. I'm
8 asking now about Canal contacting the Manhattan
9 District Attorney's Office which handles criminal
10 prosecutions.

11 MR. BENNETT: What's the question? I'm
12 sorry.

13 BY MS. MACMULLIN:

14 Q The question is whether, Ms. Weeks-Brittan,
15 you're aware of Canal seeking to have Ms. Robinson
16 criminally prosecuted?

17 MR. BENNETT: Objection.

18 THE WITNESS: I was, like, generally aware
19 that it was in criminal court at some point. I don't
20 know who reached out to who. I didn't think much into
21 that or where the suit was placed because I'm not a
22 lawyer.

23 BY MS. MACMULLIN:

24 Q How did you become aware of Canal's claims
25 against Ms. Robinson becoming a criminal matter?

1 MS. LAZZARO: Objection.

2 THE WITNESS: I don't know or can't -- I
3 don't know when it wasn't a criminal matter and when
4 it was.

5 BY MS. MACMULLIN:

6 Q How did you become aware of Canal's claims
7 against Ms. Robinson becoming a criminal matter?

8 MR. BENNETT: It's the same question.
9 Objection.

10 You can answer, if you understand.

11 THE WITNESS: All right. I guess, I just
12 don't understand.

13 BY MS. MACMULLIN:

14 Q Do you recall communicating with Kelly
15 Thomas from the Manhattan District Attorney's Office?

16 A I spoke to someone once. It was probably
17 her. I don't -- I -- I didn't pay much attention. I
18 kind of, like, show up where asked in this. Like
19 today.

20 Q When did you speak to Ms. Thomas?

21 A I'd have to look. Maybe -- let's see.
22 Probably wasn't 2020 because of the pandemic. So
23 2019.

24 Q Did you meet with Ms. Thomas in person?

25 A Yeah, I went there.

1 Q And who attended that meeting?

2 A I don't remember who else was on her side,
3 but Tom was with me.

4 Q Did you bring anything with you to that
5 meeting?

6 A I think like a purse, my phones.

7 Q Did you bring any documents with you to that
8 meeting?

9 A I don't remember. I think they might have
10 had documents already.

11 Q What was the purpose of your meeting with
12 Kelly Thomas?

13 MR. BENNETT: Objection. I think that goes
14 to the 30(b)(6).

15 To the extent you have independent personal
16 knowledge, go ahead.

17 THE WITNESS: I think they just asked me a
18 lot of things in relation to this Chase case, and I
19 answered them.

20 BY MS. MACMULLIN:

21 Q What do you recall being asked about?

22 A Spending, documents, kind of what I
23 explained to you that I've looked over at. I went
24 over them. Hopefully, had a better sense of them at
25 the time since it was way closer to when this actually

1 happened; but E-mails, Ubers, Netflix; that kind of
2 stuff.

3 Q Tell me everything you recall Ms. Thomas
4 asking you during that meeting.

5 MS. LAZZARO: Objection.

6 THE WITNESS: I really don't remember that
7 well. Like, she asked me about Chase. I mean, I
8 can't like -- it was similar -- what?

9 Yeah, I mean, it's just, like, about Chase,
10 about working with her, about spending my time at
11 Canal. Similar to everything we've discussed today.

12 BY MS. MACMULLIN:

13 Q What did you tell Ms. Thomas about
14 Ms. Robinson?

15 MS. LAZZARO: Objection.

16 THE WITNESS: I guess similar to what I've
17 told you, I think. How it was a stressful workplace
18 working with her, my view of her spending, just
19 everything that was opinion based or what I saw
20 directly.

21 BY MS. MACMULLIN:

22 Q Did you go over any documents with
23 Ms. Thomas?

24 A I think so.

25 Q What documents did you go over with her?

1 A Probably the AMEX charges and everything
2 relevant in this.

3 Q And were the documents that you went over
4 with her documents that you had prepared?

5 A I don't know. I mean, I don't remember if
6 they had their own, like, binder of evidence or if I
7 just, like, looked at their stuff or if I looked at
8 receipts and things I printed. I'm not sure. I kind
9 of feel they had stuff they showed me, but --

10 Q Ms. Weeks-Brittan, we're going to share a
11 document in the chat that's Bates stamped
12 ROBINSON00006712, and I'm going to mark that as
13 Plaintiff's Exhibit 4.

14 (Whereupon, Exhibit 4 is marked for
15 identification and is attached
16 hereto.)

17 BY MS. MACMULLIN:

18 Q This is a document that's produced in this
19 litigation. Do you recognize this document?

20 A Yeah, it's all the stuff I printed.

21 Q Is that your handwriting on the first page
22 of the document?

23 A Hang on.

24 Yeah, it is.

25 Q What is this document?

1 A It looks like the Chase AMEX and some flower
2 receipts.

3 Q Why was this document prepared?

4 A What do you mean? This was --

5 MR. BENNETT: Objection.

6 Go ahead.

7 THE WITNESS: (Inaudible.) I printed out,
8 like, invoices from the flower shop and the AMEX.

9 BY MS. MACMULLIN:

10 Q What was your understanding of why you were
11 preparing this document?

12 MS. LAZZARO: Objection.

13 THE WITNESS: To gauge what Chase spent on
14 that wasn't work appropriate.

15 BY MS. MACMULLIN:

16 Q Does this document reflect grocery store
17 charges that Canal claims that Ms. Robinson improperly
18 charged?

19 MR. BENNETT: Objection.

20 You can answer.

21 THE WITNESS: Hang on. I'm just looking
22 back. Yeah, I mean, I see a lot of, like, Whole Foods
23 and Dean & DeLuca. We don't buy Bob's groceries. He
24 has home staff. So that seems like a fair assumption.

25 Q Does this document reflect grocery store

1 charges for which Canal sought to have Ms. Robinson
2 criminally prosecuted?

3 MS. LAZZARO: Objection.

4 MR. BENNETT: Objection. Goes to 30(b)(6).

5 If you have any knowledge, you can answer.

6 THE WITNESS: I think this was one receipt
7 showing charges that weren't work charges.

8 BY MS. MACMULLIN:

9 Q Was this document requested by the Manhattan
10 District Attorney's Office?

11 A Right. Not, like, directly to me. I -- I
12 don't know. This was like -- Tasch would ask me for
13 receipts and to go through stuff. Tom, too. This is,
14 like, what I printed and found.

15 Q What instructions did Michael Tasch give you
16 in order to prepare this document?

17 A Print receipts and invoices --

18 MR. BENNETT: Objection.

19 You can answer.

20 THE WITNESS: Flag Bob legitimate charges
21 and illegitimate charges.

22 BY MS. MACMULLIN:

23 Q Did Michael Tasch give you any instructions
24 as -- as to how to identify what was a legitimate
25 charge versus an illegitimate charge?

1 A I think maybe he asked for, like, general
2 buckets of stuff. Like, what was Uber, what was
3 groceries, what was flowers; but I think, like,
4 Gillian or I would know that better than Tasch because
5 Bob doesn't grocery shop or go to Dean & DeLuca.

6 Like, it's -- it's easier for us to flag if,
7 like, Chase was in a hotel or if Bob was in a hotel
8 because we have records of where Bob was.

9 Q Within each category of expenses you just
10 mentioned, what effort did you make to ascertain what
11 was a legitimate charge versus an illegitimate charge?

12 MR. BENNETT: Objection.

13 You can answer.

14 THE WITNESS: Like, for Ubers that were
15 surrounding the apartment project, was it going to
16 stores, going to Bob's, going to stores; going to
17 Chase's? Was it just like a random Uber on a night
18 that Chase wasn't going to Bob's or work or stores?
19 That kind of stuff.

20 Was it lunch on Caviar that we all got
21 together? Was it dinner, a random dinner expense?
22 Groceries? We don't buy Bob's groceries. Was it like
23 the morning coffee or was it inexpensive Dean & DeLuca
24 grocery shopping trip?

25

1 BY MS. MACMULLIN:

2 Q Ubers surrounding the apartment project were
3 considered a legitimate expense that could be charged
4 to Canal; is that right?

5 A Um-hmm. Similar to --

6 MR. BENNETT: Objection. Goes to 30(b)(6).
7 You can answer.

8 THE WITNESS: Similar to, like, if I was
9 going to or from work, to or from Bob's apartment,
10 too, counts.

11 BY MS. MACMULLIN:

12 Q So the answer is yes?

13 A Yeah.

14 Q How were you able to ascertain whether a
15 meal expense charged by Ms. Robinson was for lunch or
16 dinner?

17 MR. BENNETT: Objection.

18 You can answer.

19 THE WITNESS: Like, restaurants she went to,
20 like Paola's, like places that were open only for
21 dinner. We got group lunch in the office. If Chase
22 wasn't there, she would get her own lunch either on --
23 often on Caviar. When I was with her at the
24 apartment, she ordered on Caviar.

25 So random grocery trips were not lunch or

1 dinner if there was a Caviar charge on the same day.

2 BY MS. MACMULLIN:

3 Q Paola's was open for lunch; is that correct?

4 MR. BENNETT: Objection.

5 MS. LAZZARO: Objection.

6 THE WITNESS: I don't know Paola's hours,
7 but I know Chase went there for dinner often.

8 BY MS. MACMULLIN:

9 Q Mr. De Niro also dined at Paola's; isn't
10 that correct?

11 A Yes. So I would cross-reference dates Bob
12 dined at Paola's with dates he didn't.

13 Q How did you cross-reference dates Bob dined
14 at Paola's?

15 A Because Gillian and I made the reservation
16 for him, and we were aware of where he dined.

17 Q Were you aware of every single dinner
18 reservation Mr. De Niro had during the time that you
19 were an executive assistant at Canal?

20 A 95 percent of them. Yeah, I had the calls
21 to make them. He doesn't really just walk in
22 anywhere. He likes a certain table.

23 Q What records do you have of when Mr. De Niro
24 dined at Paola's?

25 A Little notes in the calendar, dinner with

1 the kids at Paola's on schedule, same.

2 Q Is that a physical calendar or an electronic
3 calendar?

4 A Electronic.

5 Q What records do you -- oh, sorry.

6 A I was just going to say Bob doesn't swipe
7 Chase's AMEX when he dines at Paola's. He swipes his
8 own.

9 Q What records do you have of Mr. De Niro
10 dining at Paola's that preceded your employment?

11 A I don't, but Gillian would have access to
12 the calendar and also went through and did this.

13 Q And when did Gillian's employment begin,
14 approximately?

15 A I think a year and a half before mine.

16 Q So going back to the compilation of grocery
17 store expenses, what instructions were you given in
18 order to prepare this document?

19 MR. BENNETT: Objection. I thought we
20 covered that.

21 MS. LAZZARO: She also said she didn't
22 prepare this document. Her testimony was that she
23 printed receipts.

24 THE WITNESS: Printed these receipts, yeah.
25 This is just a printout of AMEX charges and flower

1 invoices.

2 BY MS. MACMULLIN:

3 Q So, then, who prepared this document?

4 A This is what I was saying I printed. I
5 printed AMEX document -- AMEX charges and flower
6 receipts, and Uber charges from E-mail.

7 Q Who prepared this document?

8 A I printed this document. I didn't give it
9 to the District Attorney or whoever you mentioned. I
10 don't know what was done with it after I printed it.

11 Q On the first page, do you see the \$8,923.20
12 figure?

13 A Um-hmm.

14 Q How did you arrive at that figure?

15 A I went through and highlighted legitimate
16 Bob charges on those dates versus not. I think I
17 flagged flower arrangements that went directly to
18 Chase's house that weren't when the office received
19 flowers, when Bob's house received flowers; or when
20 birthdays who got sent that -- flowers direct to them.

21 Q Is there any record that exists of what
22 expenses you flagged as legitimate versus
23 illegitimate?

24 A I'm not sure. A lot of it was highlighted.
25 I imagine maybe the lawyers would have access to that.

1 Q And if I could just turn your attention to
2 the last page of this PDF, 7, which has a Bates number
3 at the bottom right-hand corner of ROBINSON00006718.

4 I know the font is small, but do you see
5 that \$8,923.20 figure on that last page?

6 A Um-hmm. Yeah.

7 Q Did you include all charges from Whole Foods
8 on the Canal American Express card under
9 Ms. Robinson's name from May 25th, 2017 to April 6,
10 2019 to arrive at that figure?

11 A I think I included all of the ones that
12 weren't done days where she also had Canal lunch on
13 Caviar.

14 Q Did you include all charges from Dean &
15 DeLuca on the Canal American Express card under
16 Ms. Robinson's name from May 25th, 2017 to April 6,
17 2019?

18 A Same as with Whole Foods. If she did eat
19 lunch that day, I kept the grocery charge on.

20 Q So a grocery store charge was authorized if
21 she didn't also charge lunch on the same day; is that
22 correct?

23 A Not that it was authorized. Like, Chase
24 authorized -- like, if she ate lunch on Caviar, then
25 she shouldn't double charge for another meal.

1 Q Was that policy written down anywhere?

2 MR. BENNETT: Objection. 30(b)(6).

3 But you can answer, as far as you know.

4 THE WITNESS: As far as I know, no. We were
5 just told you get lunch and you get coffee.

6 BY MS. MACMULLIN:

7 Q Were there any charges for Whole Foods on
8 the Canal AMEX between May 25th, 2016 and April 6,
9 2019, that you did not include in this compilation?

10 A Yeah. Like what I said, days that she
11 didn't have lunch.

12 Q As far as you know, were any interviews
13 conducted with Canal employees in order to ascertain
14 which expenses from Whole Foods to include on the
15 compilation?

16 MR. BENNETT: 30(b)(6) objection.

17 Otherwise, you can answer.

18 THE WITNESS: Gillian and I just split work
19 and we'd occasionally go over each other's and vice
20 versa; but we were just together in the office
21 printing the stuff out, discussing what was valid, and
22 what wasn't valid.

23 BY MS. MACMULLIN:

24 Q I'm going to share another document in the
25 chat, which is Bates stamped ROBINSON00006719, which I

1 believe will be marked as Plaintiff's Exhibit 5, if my
2 math is right.

3 (Whereupon, Exhibit 5 is marked for
4 identification and is attached
5 hereto.)

6 BY MS. MACMULLIN:

7 Q Let me know when you have it up,
8 Ms. Weeks-Brittan.

9 A I have it up.

10 Q Okay. Do you recognize this document?

11 A Um-hmm.

12 Q What is it?

13 A Flower receipts.

14 Q Is that your handwriting on the first page
15 of this document?

16 A It is.

17 Q Why was this document prepared?

18 A Because I was asked to print flower receipts
19 and flag ones that weren't office-related flower
20 receipts.

21 Q Who asked you to print flower receipts and
22 flag ones that weren't office-related receipts?

23 A Tom or Tasch. I don't remember who.

24 Q Does this document reflect flower charges
25 that Canal claimed that Ms. Robinson improperly

1 charged?

2 A I think so.

3 MR. BENNETT: Objection.

4 BY MS. MACMULLIN:

5 Q Did you prepare this document?

6 A Yeah.

7 Q What instructions were you given in order to
8 prepare this document?

9 A Remove charges that were valid to Bob's
10 business contacts or birthdays that we had sent
11 flowers to as an office, flowers that would be
12 received at the office, or flowers that Bob received
13 at his home.

14 So these were arrangements that went to
15 Chase's home or went to -- like, I think maybe Chase
16 had sent flowers to Amelia. Someone who used to work
17 for her at Canal. She kept a lot of orchids around.
18 A lot of them ended up in her home.

19 Q Were those instructions given to you orally
20 or in writing?

21 A Over the phone.

22 Q And by whom were they given to you?

23 A Tom or Tasch, like I said.

24 Q How did you arrive at this \$17,119.27 figure
25 that's on the first page of this document?

1 MR. BENNETT: Objection.

2 You can answer.

3 THE WITNESS: I am just getting back to it,
4 but it's just the total of flowers once the valid ones
5 were removed.

6 BY MS. MACMULLIN:

7 Q As far as you understand, were there any
8 differences between the calculations that were
9 presented to the -- with respect to flowers and the
10 calculations with respect to flowers that were
11 included in Canal's lawsuit?

12 MR. BENNETT: Objection.

13 THE WITNESS: Can you repeat that?

14 BY MS. MACMULLIN:

15 Q Sure. As far as you understand, were there
16 any differences between the calculations presented to
17 the DA's Office with respect to flowers, and the
18 cal -- and the calculations with respect to flowers
19 that served as the basis for Canal's lawsuit?

20 MS. LAZZARO: Objection.

21 MR. BENNETT: Objection.

22 THE WITNESS: I don't think so, but I don't
23 know what went into both or either.

24 BY MS. MACMULLIN:

25 Q Did you include all charges from Flowers By

1 Philip on the Canal American Express card under
2 Ms. Robinson's name from June 28th, 2017 to
3 April 10th, 2019 in this compilation?

4 MR. BENNETT: Objection.

5 THE WITNESS: Do you --

6 MR. BENNETT: She testified already about
7 this.

8 THE WITNESS: Yeah, I flagged the ones that
9 went to the office, like it says at the top.

10 BY MS. MACMULLIN:

11 Q As far as you know, were any interviews
12 conducted with Canal employees in order to ascertain
13 which expenses from Flowers By Philip to include on
14 the compilation?

15 MR. BENNETT: Objection. 30(b)(6).

16 You can answer.

17 THE WITNESS: I guess I just, like, don't
18 view conversations that I had as interviews.

19 BY MS. MACMULLIN:

20 Q What conversations did you have about
21 flowers?

22 A I guess Tasch called me and said get the
23 flower invoices and flag, which ones Chase then didn't
24 bring to the office, brought to her home; or which
25 ones delivered straight to her. Flag that versus when

1 you received office flower deliveries or when flowers
2 were sent out for birthdays.

3 Q At times flowers were delivered to
4 Ms. Robinson's home and then she would bring them to a
5 recipient on behalf of Mr. De Niro; is that correct?

6 A I don't know, but I don't think that she
7 brought them anywhere, but the office or the home.
8 And there would be separate deliveries for those.

9 Q Ms. Robinson would bring flowers herself to
10 Mr. De Niro's [REDACTED] home; correct?

11 A Maybe a handful of times at the beginning,
12 and then, she hired landscapers.

13 Q We're going to share another document in the
14 chat that is Bates stamped ROBINSON00006770, which
15 I'll mark as Plaintiff's Exhibit No. 6.

16 (Whereupon, Exhibit 6 is marked for
17 identification and is attached
18 hereto.)

19 BY MS. MACMULLIN:

20 Q Do you recognize this document?

21 A It's still downloading. One second.

22 Q Oh, of course. Take your time.

23 A Yup. Ubers, car services, and taxis that
24 were charged, not included in petty cash.

25 Q Is that your handwriting on the first page

1 of this document?

2 A It is.

3 Q What is this document?

4 A It's a breakdown of Chase's Uber trips aside
5 from the ones that she reimbursed herself for on petty
6 cash.

7 Q Who prepared this document?

8 A Gillian or I, but I definitely wrote that at
9 the top.

10 Q Why was this document prepared?

11 MR. BENNETT: Objection.

12 You can answer.

13 THE WITNESS: My understanding was that
14 Chase took a lot of Ubers and didn't have permission
15 to, and booked car services for herself; and took them
16 all around.

17 BY MS. MACMULLIN:

18 Q What instructions were you given in order to
19 prepare this document?

20 MR. BENNETT: Objection.

21 You can answer.

22 THE WITNESS: Flag Ubers that Chase took and
23 car services that Chase took, aside from what she paid
24 herself back for on petty cash, which were the ones
25 that were going to and from the office.

1 BY MS. MACMULLIN:

2 Q And who gave you those instructions?

3 A Tom or Tasch. I don't remember who.

4 Q And were those instructions given orally or
5 in writing?

6 A Sorry. Sorry, one second.

7 Q No problem.

8 THE VIDEOGRAPHER: Should we go off the
9 record?

10 MR. BENNETT: I assume it might be a battery
11 issue, but --

12 MS. MACMULLIN: Or a doorbell.

13 MS. LAZZARO: I heard a sound. I thought it
14 was a bell.

15 THE WITNESS: Yeah, sorry. Sorry. I have a
16 package being delivered.

17 The question -- can you just repeat it
18 again?

19 MS. MACMULLIN: Could I have the court
20 reporter read it back, please?

21 (Whereupon, the question was read
22 back as follows:

23 "Q And were those instructions
24 given orally or in writing?")

25 THE WITNESS: I think the same conversation

1 when one of them just asked over the phone to flag
2 stuff that was valid Bob office and flag stuff that
3 was personal Chase.

4 BY MS. MACMULLIN:

5 Q So this was all during one-single
6 conversation with either Mr. Harvey or Mr. Tasch?

7 A I just can't distinguish between. They're
8 both like pretty short on the phone. Like, print Uber
9 receipts, print some AMEX stuff, go through and flag.
10 It could have been multiple, but it wasn't, like, a
11 long-winded conversation.

12 Q How did you arrive at the \$31,814.17 figure
13 listed next to Uber/taxi total?

14 A I'm just looking at it. I think it's
15 just -- it's all of her Uber charges, plus car
16 services, plus taxies. And then, I'm just trying to
17 see if the petty cash ones were also added to this.

18 Because petty cash would have meant she
19 charged it on her personal phone ideal -- or her
20 personal card ideally. Of course, she wouldn't need
21 reimbursements since this is her corporate card.

22 Yeah, it's all the taxi, car service, Uber;
23 Lyft charges from that period.

24 Q How did you arrive at \$5,513.05 figure
25 listed next to car service total?

1 A The car service company that we used is
2 separate. I think it must have just -- paying this
3 like a different note and I separated those.

4 I don't remember what it's called, but there
5 was a car service that she would occasionally use or
6 that around the holidays she, like, filled with gifts
7 and took it around.

8 Q Did you include all Uber charges on the
9 Canal American Express card under Ms. Robinson's name
10 from May 20, 2017 to April 5th, 2019 in this
11 compilation?

12 A I think so, but I'm not sure.

13 Q Did you include all taxi charges that had
14 the word taxi in the vendor name on the Canal American
15 Express card under Ms. Robinson's name from May 24th,
16 2017 to April 5th, 2019 in this compilation?

17 A Yeah, I think so.

18 Q As far as you know, were any interviews
19 conducted with Canal employees in order to ascertain
20 which Uber charges to include on the compilation?

21 MR. BENNETT: Objection. 30(b)(6).

22 You can answer.

23 THE WITNESS: Not, like, interviews, but
24 conversations. And, again, Chase would petty cash the
25 times that she took Ubers to and from work, and get

1 reimbursed for that on her personal card.

2 So at least to me, it seemed that this was
3 in way excess of our policy to reimburse MetroCard
4 travel.

5 BY MS. MACMULLIN:

6 Q What conversations took place with respect
7 to the Uber charges included on this compilation?

8 A I don't remember exactly, but probably, oh,
9 this is a ridiculous amount of Ubers. The rest of us
10 aren't charging Ubers.

11 Chase is getting paid back for her other
12 Ubers via petty cash. So this an absurd amount of
13 Ubers given Bob doesn't Uber.

14 Q And who participated in those conversations?

15 A In the office, probably me, Gillian, and
16 Michael. Maybe to Tasch and Tom when sending these
17 receipts and invoices to them.

18 Q As far as you know, were any interviews
19 conducted with Canal employees in order to ascertain
20 which taxi charges to include on the compilation?

21 A I guess I don't get that beyond --

22 MR. BENNETT: Objection.

23 You can --

24 THE WITNESS: She paid back herself for
25 taxies via petty cash that she paid for out-of-pocket.

1 This was a lot of taxies.

2 BY MS. MACMULLIN:

3 Q Were any communications -- were there any
4 communications between Canal employees about which
5 taxi charges to include on the compilation?

6 MS. LAZZARO: Objection.

7 THE WITNESS: Probably -- probably me and
8 Gillian.

9 BY MS. MACMULLIN:

10 Q And what did you and Ms. Spear discuss
11 during those communications?

12 A Just that she was very hard on us for our
13 petty cash. Like I said, she only paid back half of
14 my \$400 Uber to make it back to the city in the middle
15 of the night.

16 And seeing the sheer volume of Ubers,
17 taxies, and car services she took herself was pretty
18 eye opening.

19 Q Over what period of time was petty cash used
20 for reimbursing Ms. Robinson for Ubers or taxies?

21 A I can only --

22 MR. BENNETT: Focusing on this document?

23 MS. MACMULLIN: Focusing --

24 MR. BENNETT: I just have a quick --

25

1 BY MS. MACMULLIN:

2 Q To your knowledge, over what period of time
3 was petty cash used for reimbursing Ms. Robinson for
4 Ubers or taxies?

5 MR. BENNETT: Objection. 30(b)(6).

6 THE WITNESS: Yeah, just the ones that
7 either Gillian or I found the Excel petty cash
8 documents in -- in her E-mail or in her sent.

9 BY MS. MACMULLIN:

10 Q As far as you know, did anyone express
11 concern about sending a compilation to the District
12 Attorney's Office that included all Uber charges?

13 MS. LAZZARO: Objection.

14 THE WITNESS: No one said anything to me.

15 BY MS. MACMULLIN:

16 Q Did you have any concern about sending a
17 compilation to the District Attorney's Office that
18 included all Uber charges?

19 MS. LAZZARO: Objection.

20 THE WITNESS: I didn't -- I didn't send the
21 compilation to the District Attorney's Office. I sent
22 a compilation to Tom and Tasch.

23 BY MS. MACMULLIN:

24 Q Prior to preparing the compilation of Uber
25 charges, did you communicate with Mr. De Niro to

1 ascertain what Ms. Robinson was authorized to charge?

2 A I didn't speak to Bob. I think maybe Tom
3 and Tasch did.

4 Q Prior to preparing the compilation of taxi
5 charges, did you communicate with Mr. De Niro to
6 ascertain what Ms. Robinson was authorized to charge?

7 A I didn't speak to Bob about it. My
8 understanding was she was authorized to charge the
9 ones that she petty cash charged that were to and from
10 the office or his home.

11 Q What was the basis for that understanding?

12 A That was the policy we had in place, to
13 submit petty cash expense reports of our charges to
14 and from work on Ubers if we needed.

15 If we needed to run something uptown, put
16 that in petty cash, submit it to Chase, get
17 reimbursed. Same for the MetroCard. Same for the gym
18 reimbursement with receipt.

19 Q You weren't aware as to whether Ms. Robinson
20 had a different agreement with Mr. De Niro as to Uber
21 reimbursement; is that correct?

22 A I'm not aware.

23 Q You weren't aware as to whether Ms. Robinson
24 had a different agreement with Mr. De Niro as to taxi
25 reimbursement; is that correct?

1 A Not aware. I just printed what I was asked.

2 Q Prior to preparing the compilation of flower
3 charges, did you communicate with Mr. De Niro to
4 ascertain what Ms. Robinson was authorized to charge?

5 A Nope, just went to Tom and Tasch.

6 Q Prior to preparing the compilation of
7 grocery charges, did you communicate with Mr. De Niro
8 to ascertain what Ms. Robinson was authorized to
9 charge?

10 A Nope. I was told she was authorized to
11 charge lunch, and that's why I checked Caviar against
12 dates she made other purchases.

13 Q Did Mr. De Niro tell you that she was
14 authorized to charge lunch?

15 A No. I only spoke to Tom and Tasch.

16 Q Ms. Robinson wasn't only allowed to charge
17 lunch to Caviar; is that right?

18 A Correct.

19 Q "Correct," meaning she was not only allowed
20 to charge lunch to Caviar?

21 A Yeah, according to what he said. That's why
22 we cross-referenced it against days that she made
23 Caviar lunch purchases.

24 Q But Ms. Robinson -- (Inaudible.)

25 A She was allowed to charge elsewhere. She

1 wasn't allowed to charge multiple meals in the same
2 day all over the place.

3 Q Prior to preparing the compilation of
4 Paola's charges, did you communicate with Mr. De Niro
5 to ascertain what Ms. Robinson was authorized to
6 charge?

7 A No, I don't think so. He seemed surprised
8 that she dined at Paola's as much, but, again, I
9 cross-referenced that with dates that he was at
10 Paola's.

11 Q Ms. Weeks-Brittan, we're sharing a document
12 in the chat that is Bates stamped ROBINSON00006728,
13 and I'm marking this document as Plaintiff's Exhibit
14 6. Let me know when you have it up.

15 A Yeah, I see SkyMiles.

16 Q I'm sorry, we might be at Plaintiff's
17 Exhibit 7, so if that's the case, this is
18 Plaintiff's --

19 MS. MACMULLIN: Or, Madam Court Reporter,
20 could you let me know what exhibit we're on?

21 MR. BENNETT: I think it is 7.

22 MS. MACMULLIN: Okay. So, then, I'll mark
23 this as Plaintiff's Exhibit 7. Thank you.

24 (Whereupon, Exhibit 7 is marked for
25 identification and is attached

1 hereto.)

2 BY MS. MACMULLIN:

3 Q Is that your handwriting on the first page
4 of this document, Ms. Weeks-Brittan?

5 A Yes. I -- I wrote this, but I didn't put
6 together the SkyMiles. Like, I wrote once everything
7 was organized, too. So Michael Kaplan and Gillian
8 were also producing all this stuff. It's just my
9 handwriting.

10 Q What is this document?

11 A Chase's use of Bob's Delta SkyMiles.

12 Q Why was this document prepared?

13 MS. LAZZARO: Objection.

14 THE WITNESS: Same reason as the rest. Tom
15 or Tasch asked and none of us thought that Chase was
16 allowed to use Bob's SkyMiles in this way. And I
17 think Kap put this together.

18 BY MS. MACMULLIN:

19 Q You weren't aware as to whether Ms. Robinson
20 had an agreement with Mr. De Niro as to her use of
21 SkyMiles; is that correct?

22 A I learned that he was shocked that she used
23 his SkyMiles. So I -- I don't know if she feels they
24 had an agreement prior, but he seemed surprised and
25 unaware of his AMEX points being transferred into

1 SkyMiles. It took multiple people explaining to him
2 what SkyMiles were and explain where his AMEX points
3 went.

4 Q What did Mr. De Niro communicate to you
5 about the SkyMiles?

6 A He was confused just about what they were.
7 And he had conversations I think with Tom and Tasch
8 and with Michael Kaplan about exactly what Chase used,
9 and how they were his AMEX points. Just he was a
10 little confused by like the SkyMiles, what they are.

11 Q Does this document reflect SkyMiles that
12 Canal claimed that Ms. Robinson improperly used or
13 transferred?

14 MR. BENNETT: Objection. Goes to the
15 30(b)(6).

16 To the extent you understand, have knowledge
17 of it, you can answer.

18 THE WITNESS: Yeah, I mean, I viewed them as
19 improper personally.

20 BY MS. MACMULLIN:

21 Q What instructions were you given in order to
22 prepare this document to the extent that --

23 MR. BENNETT: Objection.

24 MS. MACMULLIN: I can rephrase my question.

25 MR. BENNETT: Sorry.

1 BY MS. MACMULLIN:

2 Q What, if any, instructions were you given in
3 order to complete your role in preparing this
4 document?

5 A I didn't prepare this one. I wrote at the
6 top, but if you scroll down to Page 4, where it very
7 poorly says "Cancelled" in scribble, I think that's
8 Kap's handwriting.

9 And then down, yeah, the next page,
10 "Amelia?" Kap -- Kap prepared this document. I just,
11 like, wrote a header when I stuck everything in a
12 binder.

13 Q You prepared a binder that included these
14 documents?

15 A I put everything that I printed, yeah, in a
16 binder.

17 Q And for whom was the binder prepared?

18 A Tom and Tasch.

19 Q Ms. Weeks-Brittan, we're sharing a document
20 in the chat, which is Bates stamped ROBINSON00006741.
21 I'm marking it as Plaintiff's Exhibit 8.

22 (Whereupon, Exhibit 8 is marked for
23 identification and is attached
24 hereto.)
25

1 BY MS. MACMULLIN:

2 Q Let me know when you are able to open it.

3 A Yup, I opened it.

4 Q Do you recognize this document?

5 A Yeah. It's Chase's petty cash.

6 Q Is that your handwriting on the first page
7 of this document?

8 A Yeah.

9 Q And if you turn to Page 13 of this document,
10 which has -- if you'll give me one second -- a Bates
11 stamp in the bottom right-hand corner --

12 A I see the --

13 Q -- of ROBINSON -- um-hmm. I'll just say the
14 Bates stamp for the record. It's ROBINSON00006753.

15 Is that your handwriting on this --

16 A It is.

17 Q -- page of the document?

18 A I wrote matters, but I didn't do the whole
19 thing, to clarify that again.

20 Q Who prepared this document?

21 A I think Gillian and I both did. Yeah, I
22 think so.

23 Q Why was this document prepared?

24 MR. BENNETT: Objection.

25 You can answer.

1 THE WITNESS: Same reason as all the others.
2 Find valid versus non-valid charges.

3 BY MS. MACMULLIN:

4 Q You weren't employed at Canal when the
5 so-called Taxi Driver trip took place; correct?

6 A Correct. Gillian just told me about that.

7 Q Did you speak with Mr. De Niro about the
8 so-called Taxi Driver trip?

9 A No.

10 MR. BENNETT: Objection.

11 THE WITNESS: Gillian did that part. She
12 was there at the time.

13 BY MS. MACMULLIN:

14 Q What instructions were you given in order to
15 prepare this document?

16 MR. BENNETT: Objection. She didn't testify
17 that she prepared the whole thing.

18 BY MS. MACMULLIN:

19 Q You can answer the question.

20 A It's the same. I was asked to flag
21 improper, invalid charges. This document at least is
22 cross-referencing her work trips with vacation and
23 personal travel. Yeah.

24 BY MS. MACMULLIN:

25 Q Did you have any direct communications with

1 Mr. De Niro concerning the criminal investigation into
2 Ms. Robinson?

3 MR. BENNETT: Objection. Went through
4 the --

5 THE WITNESS: No, I don't think so.

6 BY MS. MACMULLIN:

7 Q Did you have any direct communications with
8 Tom Harvey concerning the criminal investigation into
9 Ms. Robinson?

10 A Yeah.

11 MR. BENNETT: Objection.

12 You can answer.

13 THE WITNESS: Yes.

14 BY MS. MACMULLIN:

15 Q Did you have any direct communications with
16 lawyers at Tarter Krinsky & Drogin concerning the
17 criminal investigation into Ms. Robinson?

18 A I don't think so because I only talked to
19 Greg, who is not at that firm, if I'm correct.

20 Q And did you have direct communications with
21 Mr. Tasch concerning the criminal investigation into
22 Ms. Robinson?

23 A Yeah.

24 Q Other than the meeting in person with
25 Ms. Thomas to which you testified previously,

1 Ms. Thomas reached out to you, and Mr. Kaplan to ask
2 for contact information for former Canal employees
3 over E-mail; is that correct?

4 A I think that rings a bell, yeah.

5 Q Other than the in-person meeting and that
6 E-mail, did you have any other communications with
7 Ms. Thomas concerning Ms. Robinson?

8 A I don't think so, but I'd have to look
9 through my E-mails.

10 Q As far as you know, was anyone concerned
11 that bringing the allegations against Ms. Robinson to
12 the Manhattan District Attorney's Office was taking
13 things too far?

14 MR. BENNETT: Objection.

15 MS. LAZZARO: Objection.

16 MR. BENNETT: You can answer.

17 THE WITNESS: No one relayed that sentiment
18 to me at all. It was kind of the opposite sentiment.
19 That people thought it was appropriate.

20 BY MS. MACMULLIN:

21 Q Which people expressed to you that it was
22 appropriate?

23 MR. BENNETT: I'm just going to instruct you
24 insofar as it relates to Attorney Harvey's comments,
25 don't disclose those. Otherwise, you can answer the

1 question.

2 THE WITNESS: Oh, yeah. No, I just mean,
3 like, Gillian and Michael. Like, we'd talk talked at
4 the office. Probably Tiffany definitely thought it
5 was appropriate.

6 BY MS. MACMULLIN:

7 Q What was Gillian Spear's reaction to the
8 fact that Ms. Robinson was being investigated by the
9 Manhattan District Attorney's Office?

10 A I think she was pleased, but I'd have to let
11 her speak for herself.

12 Q Did she express anything to you about why
13 she was pleased?

14 A She, like, had panic attacks from Chase.
15 She really hated working for her and was extremely
16 stressed, and largely burned out from the years under
17 her. So she had some pleasure from the fact that
18 Chase was getting what she felt she deserved.

19 Q How did Michael Kaplan react to the fact
20 that Ms. Robinson was being investigated by the
21 Manhattan District Attorney's Office?

22 MR. BENNETT: Objection. She testified to
23 that.

24 BY MS. MACMULLIN:

25 Q You can answer.

1 A I think he was less, like, overtly
2 enthusiastic than Gillian, but I think he never
3 expressed to me that he felt it was, too, far. He
4 felt it was fair.

5 Q Did Mr. De Niro ever convey to you that he
6 wanted to have Ms. Robinson prosecuted?

7 A No. We just had that conversation where he
8 learned of everything and told me that he didn't trust
9 her; and that I had his trust until I broke it.

10 Q And what reaction did Tiffany Chen have to
11 the fact that Ms. Robinson was being investigated by
12 the Manhattan District Attorney's Office?

13 A I think that she was pleased.

14 Q Did she express to you why she was pleased?

15 A I don't remember specifically. She didn't
16 like Chase and she felt that she stole and did a
17 number of things; so similar getting what she deserved
18 type of thing.

19 Q Did she ever say to you that she thought
20 Ms. Robinson should be jailed?

21 A Well, you showed me that text that pretty
22 much said that, but I remember it. But based on that,
23 yeah. Yes.

24 Q Did there come a time where you learned that
25 the Manhattan District Attorney's Office would not be

1 bringing criminal charges against Ms. Robinson?

2 A Not really 'cause I was just not -- like I
3 didn't understand the differences in where these
4 claims were submitted. I knew Bob sued Chase and I
5 wasn't like following exactly where that was.

6 Q As far as you know, did Kelly Thomas or
7 anyone else from the Manhattan District Attorney's
8 Office present questions about Ms. Robinson that Canal
9 was unable to answer?

10 MS. LAZZARO: Objection.

11 THE WITNESS: I don't know what Canal was
12 unable to answer to them.

13 BY MS. MACMULLIN:

14 Q Are you aware of anything that Canal was
15 unable to answer to them?

16 A No, I don't think I'd be privy to it.

17 Q As far as you know, did Kelly Thomas or
18 anyone else from the Manhattan District Attorney's
19 Office ever express any view about the allegations
20 that Canal was making against Ms. Robinson?

21 A I remember when I was physically sitting
22 down with them, there were moments of shock and
23 surprise at her treatment of people.

24 Q As far as you know, did Kelly Thomas or
25 anyone else from the Manhattan District Attorney's

1 Office ever express skepticism about the claims that
2 Canal was making against Ms. Robinson?

3 MS. LAZZARO: Objection.

4 THE WITNESS: Not to me, they didn't express
5 that.

6 BY MS. MACMULLIN:

7 Q Looking back to the time before
8 Ms. Robinson's employment at Canal ended, what
9 qualities did Mr. De Niro value in Ms. Robinson?

10 MS. LAZZARO: Objection.

11 MR. BENNETT: Objection.

12 THE WITNESS: I can't --

13 THE REPORTER: Hold on.

14 THE WITNESS: -- say for sure because he
15 didn't verbalize them to me. Based on our trust
16 conversation and my own experience with him, I think
17 he values having trusted people with historic
18 knowledge, who have his best interests at heart. He
19 says that he values that to me, but he didn't discuss
20 what he valued about Chase with me.

21 THE REPORTER: On that last objection, it
22 was -- was that you, Brittany?

23 MS. LAZZARO: Yes, it was.

24 THE REPORTER: Okay, thanks.

25 MS. LAZZARO: Thanks, Diana.

1 THE REPORTER: Sure.

2 BY MS. MACMULLIN:

3 Q Looking back to the time before
4 Ms. Robinson's employment at Canal ended, to your
5 knowledge, what positive things did Mr. De Niro say
6 about Ms. Robinson?

7 A He said she got stuff done. We didn't have
8 loads of long-winded conversations before she left
9 because I submitted stuff to her. She was sort of
10 gatekeeper between us.

11 I talk to Bob more frequently now, but in
12 the moment, we didn't have a relationship to go much
13 further in how he felt about her.

14 Q What other positive things did Mr. De Niro
15 say about Ms. Robinson before her employment ended?

16 A Not stuff that I had heard directly other
17 than that he thought that she was effective at getting
18 stuff done. He, before she resigned, asked me if he
19 thought the office could function without her.

20 And I was nervous to say one way or the
21 other because I like disliked working with Chase. I
22 didn't want to say something and then have Chase stick
23 around and be mean to me as a result of that.

24 All I said was like, yes, the office can
25 definitely get by without Chase. He was like okay.

1 It was no longer than that.

2 Q When did that conversation take place?

3 A Early April maybe. I think he asked me,
4 Gillian, and Michael what we thought of her. I worked
5 with her for the least amount of time. So, like I
6 said, I was short and just said we -- we'd be fine
7 without her and left it at that.

8 Q And this is early April 2019?

9 A Yeah.

10 Q Over the course of your employment, what
11 positive things do you recall people at Canal saying
12 about Ms. Robinson?

13 A Very little.

14 Q Do you recall any positive things that
15 people at Canal said about Ms. Robinson over the
16 course of your employment?

17 A You know, that Peter Grant entertainment
18 lawyer, who is not in Canal, so this is beyond your
19 question; but he thought that Chase was very good. No
20 one at Canal liked her or told me positive things
21 about her.

22 Q To your knowledge, what positive things did
23 Tom Harvey say about Ms. Robinson?

24 A He didn't tell me any positive things about
25 her.

1 Q You didn't like Ms. Robinson; is that
2 correct?

3 A Correct.

4 MS. MACMULLIN: Can we take a five-minute
5 break, Madam Court Reporter? I know I'm very close to
6 wrapping up here. So if we could just take five
7 minutes and then, we'll come back at 6:35 Eastern,
8 that would be great.

9 THE REPORTER: Okay.

10 THE VIDEOGRAPHER: All right. It's --

11 MS. MACMULLIN: Thank you.

12 THE VIDEOGRAPHER: -- 3:25 --

13 MR. BENNETT: Just -- Kate, before we log
14 off.

15 MS. MACMULLIN: Yes.

16 MR. BENNETT: Only because the court
17 reporter mentioned maybe needing more of a break.

18 MS. MACMULLIN: I'm very much almost done,
19 Greg.

20 MR. BENNETT: Right, but -- but I'm going to
21 have some questions, too, and I was going to ask for a
22 break.

23 MS. MACMULLIN: Okay.

24 MR. BENNETT: So I wonder if it might just
25 make sense, be more efficient for everyone, and if you

1 don't want to --

2 MS. MACMULLIN: To do a longer break? Yeah,
3 what -- what are you thinking?

4 MR. BENNETT: 6:45; is that all right?

5 MS. MACMULLIN: That's fine with me.

6 MR. BENNETT: Okay. It allows everyone to
7 take a little breather.

8 MS. MACMULLIN: Great.

9 MR. BENNETT: Okay. Thank you.

10 THE VIDEOGRAPHER: It is 3:30 and we're
11 going off the record.

12 (Lunch recess.)

13 THE VIDEOGRAPHER: All right. It is 3:48
14 and we are back on the record.

15 MS. MACMULLIN: Ms. Weeks-Brittan, I have no
16 further questions at this time. I understand that
17 your lawyer wants to ask you some further questions.

18 THE WITNESS: Thanks.

19 MR. BENNETT: Thank you, Kate.

20 Thank you, Sabrina. I will try to keep this
21 as brief as possible.

22 I'd just like to note for the record that
23 the witness would like to read and sign the
24 transcript, if that could be noted, please.

25 ///

1 EXAMINATION

2 BY MR. BENNETT:

3 Q Sabrina, do you know who Dan Harvey is?

4 A I do.

5 Q What were his job duties?

6 A He's Bob's personal trainer and he runs
7 lines with him.

8 Q Were his job duties in any way similar to
9 Ms. Robinson's job duties as far as you're aware?

10 A No. She was VP of Production and Finance.

11 Q And you were hired in July of 2018; is that
12 correct?

13 A Correct.

14 Q Okay. Lulu White is not -- hired in August
15 of 2018; does that sound about right?

16 A Yeah.

17 Q And who is Amelia Brain?

18 A I think she was Chase's old assistant, who
19 either moved to L.A. or now, lives in L.A. But she
20 did used to work for Chase.

21 Q Okay. And is -- do you recall any time
22 period around or following the time that you commenced
23 employment at Canal where Amelia Brain returned to
24 Canal in any capacity?

25 MS. MACMULLIN: Objection to the form of the

1 question.

2 THE WITNESS: Can I answer?

3 BY MR. BENNETT:

4 Q Yes.

5 A She came to Bob's apartment one time when I
6 was there with Chase and Lulu. I was going back to
7 the office to do office duties.

8 And Lulu, my understanding, was brought in
9 to work for Chase and on the apartment project. And
10 my understanding Chase brought in Amelia to help at
11 that time as well in the apartment.

12 Q And as far as you recall or were aware of
13 back then, did Amelia pay for her plane ticket to fly
14 in from California?

15 MS. MACMULLIN: Objection to the form of the
16 question.

17 THE WITNESS: I wasn't aware at the time,
18 but looking over everything, I realized that she did
19 not pay for her flight.

20 BY MR. BENNETT:

21 Q How was it paid for?

22 A Chase AMEXed her SkyMiles.

23 Q Okay. And in reviewing the records after
24 Ms. Robinson resigned from Canal, did you come across
25 any information indicating that Amelia had been

1 provided with petty cash during her trip?

2 MS. MACMULLIN: Objection to the form of the
3 question.

4 THE WITNESS: I did find that she received
5 petty cash during the trip.

6 BY MR. BENNETT:

7 Q Okay. And generally, over the course of
8 your employment with Canal before you moved out west,
9 were there valuables maintained inside Canal's office?

10 MS. MACMULLIN: Objection to the form of the
11 question.

12 THE WITNESS: Yeah, there is a safe. And
13 just, generally, a lot of Bob's stuff is valuable.

14 BY MR. BENNETT:

15 Q And when you refer to Bob's stuff, is that
16 paraphernalia or souvenirs, or things; or props that
17 were used on movie sets?

18 MS. MACMULLIN: Objection.

19 THE WITNESS: Yeah. And, like, awards and,
20 you know, expensive technology, expensive bottles of
21 wine that are sent to him; gifts that are sent to him;
22 paintings; stuff like that.

23 BY MR. BENNETT:

24 Q Okay. And over the course of this same time
25 period, throughout your employment with Canal before

1 you moved out west, was there any type of written
2 policy that existed that said you should not take
3 valuables home to your -- to your home from the
4 office?

5 MS. MACMULLIN: Objection to form.
6 Objection to form.

7 THE WITNESS: No, it was just, like, morally
8 normal thing to not take stuff home.

9 BY MR. BENNETT:

10 Q It's common sense; right?

11 A Yeah.

12 Q Okay. Were you employed at Canal when
13 Morgan Billington was employed?

14 A No. I was hired to replace her.

15 Q Do you know if Ms. Robinson ever conveyed to
16 anyone other than yourself any disparaging comments
17 about Morgan Billington?

18 MS. MACMULLIN: Objection to form.

19 THE WITNESS: Gillian, when we became
20 closer, and Gillian is good friends with Morgan, told
21 me that she felt that Chase was particularly hard on
22 Morgan. She didn't like that Bob liked Morgan more
23 than her. She squeezed Morgan out. And that she
24 didn't like that Morgan was black and made Morgan feel
25 uncomfortable.

1 BY MR. BENNETT:

2 Q Okay. How was it that you learned what job
3 duties Ms. Robinson performed at Canal when you
4 started there?

5 MS. MACMULLIN: Objection to form.

6 THE WITNESS: I asked her when she
7 interviewed me what her job was. I asked Kaplan what
8 his job was, too, and then just working with her and
9 around her.

10 BY MR. BENNETT:

11 Q And did Chase ever call you in the middle of
12 the night to make sure your phone was on during the
13 occasions when you were on call?

14 MS. MACMULLIN: Objection --

15 THE WITNESS: Yes.

16 MS. MACMULLIN: -- to form.

17 THE WITNESS: And like I mentioned, how I
18 came in after the middle of the night snow storm
19 situation, she constantly would call pretty much to
20 the minute of when we were expected to be sitting at
21 our desks to make sure that we had the phone on.
22 That -- that someone was there.

23 Chase wasn't in the office. I think she was
24 actually in New York at the time when I raced back and
25 took a middle of the night Uber that I mostly paid for

1 out of my own pocket.

2 She would -- she called me once over the
3 Christmas holiday. I was on vacation, but on call.
4 Mind you, I didn't get my vacation day paid back, but
5 I had the phone on.

6 She called me at, like, 2:00 or 3:00 a.m.
7 the week of Christmas to check that the phone ringer
8 was on.

9 She constantly called early and late to make
10 sure that we were doing our duties of being on the
11 phone. Where the phone's on loud, if Bob calls me, I
12 pick it up. You know, that's that.

13 If he calls me at 7:00 a.m., he apologizes
14 for calling early and gets on with his ask; but it's
15 never middle of the night like that.

16 Q Thank you.

17 Other than Ms. Robinson, over the course of
18 your time period at Canal, was there anyone else
19 responsible for checking the time sheets that you
20 completed, and when you noted your hours worked for
21 each particular week?

22 MS. MACMULLIN: Objection to form.

23 THE WITNESS: We all submitted them --
24 Gillian and I submitted them to Chase. I believe that
25 Chase sent them to Tasch and told Tasch, like, okay to

1 pay us the overtime approved, that kind of stuff.

2 BY MR. BENNETT:

3 Q Do you ever recall an instance where
4 Ms. Robinson noted that you may have made a mistake in
5 a time sheet and she asked you to correct it?

6 MS. MACMULLIN: Objection to form.

7 THE WITNESS: Yeah, she would send me back
8 notes and say, "Oh, correct this." Or, you know,
9 sometimes it would be errors like with a.m./p.m. and
10 she would review them; and send them back to me to
11 remedy. And then, I'd send her the completed version.

12 BY MR. BENNETT:

13 Q And did you ever review anyone else's time
14 sheets?

15 A No.

16 Q Okay. After Ms. Robinson resigned, was
17 there a period of time where you and Gillian worked
18 together to ensure that nothing would fall through the
19 cracks with respect to Bob's schedule at the time?

20 MS. MACMULLIN: Objection to form.

21 THE WITNESS: Yes. And that was something
22 that Bob had asked me, you know, make sure nothing
23 falls through the cracks.

24 Like, can you do this without Chase?

25 Gillian and I, that's why we were looking at her

1 E-mails as well, make sure we weren't missing
2 anything. Make sure everything -- like, there was no
3 loose slack anywhere.

4 We were later told by Bob that we were doing
5 a good job and nothing slipped.

6 BY MR. BENNETT:

7 Q Okay. And in the course of conducting that
8 review to ensure nothing fell through the cracks, did
9 you come across any expenditures or expense-related
10 issues that you questioned?

11 MS. MACMULLIN: Objection to form.

12 THE WITNESS: Gillian and I spoke a fair
13 amount about Chase. And, you know, it -- it was
14 gossipy, but bound in reality, too. And we saw her
15 expenses. We saw how she lived her life. She tended
16 to overspend at places that Bob would spend at.

17 Gillian and I guessed was the way to conceal
18 her own habits, but she'd go to a nice hotel maybe
19 that Bob would go to; and that -- that somehow
20 justified her staying there in a luxury place, as if
21 Bob cared or wanted us to check his hotels. He has
22 travel agents. We talked about that stuff a fair bit.

23 BY MR. BENNETT:

24 Q And did you ever convey -- did you or
25 Gillian ever convey any of the expense-related

1 questions or questionable entries you came upon to
2 anyone else within or --

3 MS. MACMULLIN: Objection --

4 BY MR. BENNETT:

5 Q -- outside of Canal?

6 MS. MACMULLIN: Objection to form.

7 THE WITNESS: Yeah, I think we flagged stuff
8 for Tom and Tasch, too, post Chase. Because for years
9 people complained about Chase and nothing happened.

10 So at least with Gillian, she was pretty
11 certain that it would be a lot of the same this time,
12 and that Chase wouldn't actually go anywhere.

13 So we were hesitant -- more hesitant when
14 Chase was working there to report things because we
15 didn't want to be like -- you know, Chase found out
16 and then, like, especially mean to us or chain us to
17 our desks even more.

18 So we -- we were both -- the flood gates
19 opened after she left and we realized we could
20 actually flag little things we had noticed over time.

21 BY MR. BENNETT:

22 Q Okay. And as far as you recall, I
23 appreciate it goes back several years, in early April
24 2019 when Ms. Robinson resigned, was the -- the
25 Tribeca Film Festival about to occur, on the horizon?

1 MS. MACMULLIN: Objection to form.

2 THE WITNESS: Yeah, I think it was end of
3 April that year, early May.

4 BY MR. BENNETT:

5 Q And do you recall whether or not
6 Ms. Robinson had plans to attend the festival?

7 A Yeah, she had tickets to certain events and
8 she ran through the schedule with Bob and flagged with
9 him, like, which things he was speaking at; events he
10 was attending.

11 Divvied up his friends and family tickets
12 like accordingly, with some for herself. She gave
13 Gillian and I a few tickets to send -- attend certain
14 things.

15 Q And around the same time period, early
16 April 2019 before Ms. Robinson resigned, do you recall
17 whether or not Ms. Robinson had been trying to arrange
18 for everyone to get together for a dinner?

19 And by "everyone," I mean yourself, Gillian,
20 Lulu, and Kaplan.

21 MS. MACMULLIN: Objection to form.

22 THE WITNESS: Yeah. She had been -- I want
23 to say the night -- the week that she left, she had
24 texted us about doing an in-office dinner. I think we
25 had looked even at a few restaurants. And then, it

1 didn't get scheduled and she ended up resigning.

2 BY MS. MACMULLIN:

3 Q Do you recall if Ms. Robinson ever explained
4 the rationale or the reasoning why she wanted to get
5 together for dinner?

6 MS. MACMULLIN: Objection to form.

7 THE WITNESS: I want -- she used to plan
8 them -- like, we'd do an office dinner around the
9 holidays or around a Canal employee's birthday.

10 I don't -- I mean, it might have been for
11 her birthday which I think was in February, that we
12 hadn't ended up doing a dinner for. Maybe we did.

13 But it was a kind of let's boost your office
14 spirits dinner and it was -- they were always kind of
15 awkward. We didn't love going or socializing beyond
16 work hours.

17 BY MS. MACMULLIN:

18 Q Okay. And with respect to the work that you
19 just testified about to ensure that nothing fell
20 through the cracks with respect to Bob's schedule, at
21 some point, unless I misunderstood your testimony, an
22 investigation began following that work; is that fair?

23 MS. MACMULLIN: Objection to form.

24 THE WITNESS: Yeah. That's what I was
25 trying to convey why it was confusing to me. Because

1 when Chase left, we were aware, and -- and Kaplan as
2 well, improper behaviors.

3 That's why we were really quick to change
4 the password and credit card cancellations because it
5 was tense; and Chase had control of everything.

6 Like I said, she set my computer password
7 and E-mail password, and told me I couldn't change it.
8 So she had full reign over the office stuff. We were
9 swift in that.

10 And looking through her E-mails, we found,
11 you know, confirmation that she was charging quite a
12 lot that me, Michael, and Gillian didn't perceive as
13 within the job.

14 BY MR. BENNETT:

15 Q And with respect to the investigation that
16 Ms. Robinson's counsel took you through throughout the
17 course of today, you don't know precisely when the
18 investigation began; is that right?

19 MS. MACMULLIN: Objection to form.

20 THE WITNESS: Yeah, I didn't -- that's what
21 I was trying to convey, too. Like, I just -- we were
22 all looking into it. Tasch, too. He was auditing the
23 finances. Like, we were concerned.

24 His -- everyone separately was aware she had
25 been doing things. And then, when, finally, we could

1 talk about it upon her exit and we weren't afraid that
2 she would hate us for the rest of our employment,
3 retaliate against us in any way, then we all talked to
4 each other; and everyone noticed what was happening.

5 And in my mind, like, an informal
6 investigation started right away, which is why I
7 didn't -- I can't pinpoint when it became a formal
8 investigation. I just thought I was gathering and
9 generally adding to an audit of Chase's behavior.

10 BY MR. BENNETT:

11 Q And you and Gillian are both working as
12 executive assistants at the time Ms. Robinson resigns;
13 is that right?

14 A Correct.

15 Q Following her resignation, at any point,
16 have you learned what Ms. Robinson was earning from --
17 as a salary from Canal --

18 MS. MACMULLIN: Objection --

19 BY MR. BENNETT:

20 Q -- at the time?

21 MS. MACMULLIN: Objection to form.

22 THE WITNESS: No. Like, we didn't -- she
23 wasn't replaced. So when we were alerted of her
24 salary, we were, obviously, quite shocked.

25 And she made quite a bit more than Michael

1 Kaplan, who had been there the same amount of time as
2 her. So it was a jarring number when it broke.

3 BY MR. BENNETT:

4 Q And would it surprise you if Ms. Robinson
5 had testified that you, Gillian -- you, Gillian, and
6 Kaplan, essentially, performed all of the same duties?

7 MS. MACMULLIN: Objection to form.

8 THE WITNESS: It wouldn't surprise me if she
9 said that Gillian and I performed the same duties.

10 Are you saying she would say --

11 BY MR. BENNETT:

12 Q That she herself performed the same duties
13 as all of you.

14 MS. MACMULLIN: Objection --

15 THE WITNESS: (Inaudible.)

16 MS. MACMULLIN: -- to the form.

17 THE WITNESS: She managed. That's why I had
18 to submit things through her, like my timecard and
19 petty cash. And I would submit the travel itineraries
20 for her approval before I was able to send them on to
21 Bob. She was an in-between.

22 BY MR. BENNETT:

23 Q When it came to vacation scheduling, what
24 would you do? How would you -- how would you obtain
25 approval to take vacation?

1 MS. MACMULLIN: Objection to form.

2 THE WITNESS: We -- Gillian and I would
3 first talk to each other to make sure there was
4 sufficient after-hours phone coverage.

5 So if I wanted a weekend next month, I'd
6 say, "Hey," you know, before I'd go to Chase, "will
7 you cover me this weekend next month?"

8 Gillian says, "Sure. I have nothing going
9 on that weekend."

10 And I would E-mail or text Chase and say,
11 "Gillian has agreed to cover me. Can I request these
12 days off?"

13 She'd say yes or no. And if Bob was in
14 town, she'd say like, "No, I don't think an assistant
15 should take time off right now where Bob's in town."
16 Something like that. And then, that was that.

17 Since then, I E-mail Bob directly with my
18 vacation requests.

19 BY MR. BENNETT:

20 Q Have you ever taken or transferred to your
21 own account SkyMiles that belong to Mr. De Niro?

22 MS. MACMULLIN: Objection --

23 THE WITNESS: No.

24 MS. MACMULLIN: -- to form.

25

1 BY MS. MACMULLIN:

2 Q As far as you're aware, has Gillian done
3 that?

4 MS. MACMULLIN: Objection to form.

5 THE WITNESS: No.

6 BY MR. BENNETT:

7 Q As far as you're aware, has Michael Kaplan
8 done that?

9 A That one I'm not sure.

10 Q Okay. With respect to Canal's payment of
11 lunches for Canal personnel, is it correct that Canal
12 paid for lunches because the assumption was that you
13 would be staying in the office and working?

14 MS. MACMULLIN: Objection to form.

15 THE WITNESS: Yes, it was a working lunch.
16 Gillian and I sat at our desks and ate. We were to
17 always be near the phones. It was a very far from
18 remote comfortable job before the pandemic and before
19 Chase left.

20 And after she left, we made changes, got rid
21 of the after-hours phone. Gillian and I would split
22 work accordingly just by transferring the phones
23 online, which was far, far, far easier than being at
24 our desks 24/7.

25

1 BY MR. BENNETT:

2 Q I know I'm jumping around quite a bit. Have
3 you ever seen Bob curse at Kaplan?

4 A Maybe, like, a "That's so fucking stupid."
5 Something like that.

6 Q Bob on occasion -- well, I'll withdraw the
7 question.

8 When you started with Canal, Bob wasn't
9 around at all; is that right?

10 MS. MACMULLIN: Objection to form.

11 THE WITNESS: Correct. He didn't interview
12 me and I didn't meet him for a couple of weeks.

13 BY MR. BENNETT:

14 Q Okay. For those first couple of weeks,
15 who's -- who's assigning you work? Ms. Robinson?

16 MS. MACMULLIN: Objection to form.

17 THE WITNESS: Chase, yeah. And I couldn't
18 answer Bob's calls at first, as well for, like, at
19 least a month.

20 BY MR. BENNETT:

21 Q Okay. Did you ever observe Ms. Robinson
22 yelling at Bob?

23 A Yeah. I mean, I'd hear their voices raised,
24 but like I said, I -- I wouldn't hear, like, exact
25 specifics to what they were yelling about.

1 Q Okay. Did Ms. Chen ever comment to you that
2 she was concerned that a man might have a romantic
3 interest in Bob?

4 MS. MACMULLIN: Objection to form.

5 THE WITNESS: Yes. Bob's straight male
6 driver, Claude, who has since been fired.

7 BY MR. BENNETT:

8 Q So I -- you've been asked a lot of questions
9 today. I realize it's a long day. I'm -- I'm close
10 to finishing up.

11 Near the beginning, you were asked a lot of
12 questions, which referred to the title of executive
13 assistant.

14 Do you recall that?

15 A Yes.

16 Q Okay. At any time when a question included
17 a reference to that title, executive assistant, did
18 you ever interpret that to include Chase Robinson?

19 A No, I was only speaking based on myself and
20 Gillian.

21 Q Because you never regarded Ms. Robinson as
22 an executive assistant; is that right?

23 MS. MACMULLIN: Objection --

24 THE WITNESS: (Inaudible.)

25 MS. MACMULLIN: -- to form.

1 THE WITNESS: Even though Kap ran errands
2 and I was vaguely unclear of his title, there was an
3 office distinction of Gillian and I were the executive
4 assistants.

5 Michael was in a random -- like, he'd do
6 errand and events and archiving. And Chase was VP of
7 Production and Finance.

8 BY MR. BENNETT:

9 Q And did you, Gillian, or Kaplan ever have an
10 assistant like Lulu was with respect to Ms. Robinson?

11 MS. MACMULLIN: Objection to form.

12 THE WITNESS: No.

13 BY MR. BENNETT:

14 Q Okay. Have you ever heard a recording of a
15 voicemail -- excuse me.

16 Have you ever heard a recording involving
17 Ms. Robinson yelling at Amelia?

18 MS. MACMULLIN: Objection to form.

19 THE WITNESS: Yeah, I did.

20 BY MR. BENNETT:

21 Q Okay. And did Ms. Robinson's language or
22 the tone she used on that recording that you listened
23 to surprise you?

24 MS. MACMULLIN: Objection to form.

25 THE WITNESS: No. She could be very, very

1 mean. And she had certain specific expectations that
2 weren't always or often warranted. And whether -- you
3 just had to match her or like that was that. She was
4 very critical.

5 BY MR. BENNETT:

6 Q Was it your perception that Ms. Robinson
7 tried to minimize the amount of people who would need
8 to communicate with Bob?

9 MS. MACMULLIN: Objection to form.

10 THE WITNESS: Yes. And that's actually
11 something I've been attempting to tear down in the
12 wake of Chase. She very much siloed Canal
13 Productions. She prevented Bob from speaking to Jane,
14 his co-CEO, head of his company. She would tell us
15 not to share information between our office and Jane's
16 office.

17 She had -- like I said, Gillian and I sent a
18 lot of our work through her. She'd check it. She'd
19 send it on to Bob.

20 When she left, Bob was genuinely surprised
21 that Gillian and I knew how to create his shooting
22 schedules in relation to his kid calendar. He was
23 like, "You -- you know how to do this?"

24 We were like, "Yeah, of course. We've been
25 doing it for the last couple movies."

1 He's like, "What? Like I -- Chase told me
2 she was doing this."

3 So she submitted our work as her own as
4 well, which is I think why Bob thought she was so
5 effective, and why we didn't need to replace her when
6 she left.

7 Jane's office and Jane were wildly pleased.
8 And Jane is extremely happy to have more open
9 communication now with Bob. It's just -- all around,
10 like, we are now part of Tribeca again, when we were
11 very, very siloed previously.

12 BY MR. BENNETT:

13 Q Jane Rosenthal has high standards; would you
14 agree?

15 A Yes.

16 MS. MACMULLIN: Objection to form.

17 BY MR. BENNETT:

18 Q Have you ever developed a perception,
19 whether as to yourself or anyone else, that
20 Ms. Rosenthal treated women adversely because they
21 were female?

22 MS. MACMULLIN: Objection to form.

23 THE WITNESS: No, not at all. I think that
24 Jane has high standards and she expects a lot of
25 everyone who works for her.

1 Tribeca is, like, 52 percent women. All of
2 the execs besides Bob are women.

3 Jane helped quite a bit with my promotion,
4 too. Since I'm doing development work, that falls
5 under her purview. She's been very supportive. She
6 just really disliked Chase and was happy when Chase
7 left.

8 BY MR. BENNETT:

9 Q And Ms. Robinson's counsel took you through
10 a text message involving Ms. Chen earlier. And you
11 referred to some hostility that -- what I think you
12 attributed to Ms. Chen. Do you recall that?

13 A Um-hmm.

14 Q Okay. Any of the hostility that you've ever
15 felt involving Ms. Chen or from Ms. Chen, did you ever
16 perceive that her behavior or conduct towards you
17 which contributed to that hostility was based on the
18 fact that you were a woman?

19 MS. MACMULLIN: Objection to the form of the
20 question.

21 THE WITNESS: No, not at all. Like I
22 explained earlier, she was, like, a bit vindicated
23 that she spotted Chase's -- everything in the Chase
24 situation that she flagged and was correct that she
25 felt Chase was a thief. So for a period of time, she

1 was paranoid.

2 And also, you know, like I said, you know,
3 thought -- thought Michael was potentially stealing or
4 improperly using SkyMiles. She was suspicious of
5 people, which was why that period of time was
6 particularly tense; and weird because she was trying
7 to get herself involved in office dynamics.
8 Thankfully, she didn't and that died down.

9 But there was a period where she came for
10 Michael a bit, came for Bob's driver, Claude.

11 MS. MACMULLIN: Greg.

12 THE WITNESS: And thought people were taking
13 advantage.

14 MR. BENNETT: I -- I have two questions and
15 I'm done. Two questions --

16 MS. MACMULLIN: Okay.

17 MR. BENNETT: -- I'm done. All right?

18 BY MR. BENNETT:

19 Q Do you recall learning whether Ms. Robinson
20 tried to charge flowers to her American -- to her
21 Canal American Express and have them delivered to her
22 mother's apartment on the day she resigned or the
23 following day?

24 MS. MACMULLIN: Objection to the form of the
25 question.

1 THE WITNESS: Yeah, I mean, it's something
2 that, like, Kaplan and Gillian and I laughed about and
3 found just generally ironic and weird.

4 BY MR. BENNETT:

5 Q And the payment was rejected; is that right?

6 MS. MACMULLIN: Objection --

7 THE WITNESS: Yeah.

8 MS. MACMULLIN: -- to form.

9 THE WITNESS: We canceled -- like I said, we
10 were really quick to change everything.

11 BY MR. BENNETT:

12 Q Did you ever come across an E-mail where you
13 noticed that she -- Ms. Robinson had received
14 Mr. De Niro's permission to take a particular plane or
15 incur a particular expense?

16 MS. MACMULLIN: Objection to the form of the
17 question.

18 THE WITNESS: I don't think so. I mean, I
19 still have vaca -- like, vacation request E-mails from
20 her where he said like, "Yes, please enjoy."

21 I don't know -- the Taxi Driver thing would
22 more be Gillian's since she was around at that time;
23 but I think there was a work trip. This is what
24 Gillian told me, where Chase was to take all these
25 Taxi Driver books that were signed to L.A., hand them

1 out to colleagues over there.

2 We ended up finding that she spent time in
3 L.A. before the books arrived. And I want to say,
4 like, took Amelia to Malibu -- or to Nobu during this
5 time. And they had -- it was -- might have been
6 around Amelia's birthday, there were some dinners; but
7 it predated the actual Taxi Driver books going to
8 L.A., which from Gillian's understanding was the point
9 of Chase's work trip.

10 BY MR. BENNETT:

11 Q Thank you.

12 And, finally, as we're sitting here today,
13 is there any doubt in your mind that Ms. Robinson
14 stole from Canal?

15 A There's no doubt --

16 MS. MACMULLIN: Objection to the form of the
17 question.

18 THE REPORTER: Can you repeat your answer?

19 BY MR. BENNETT:

20 Q Can you repeat your answer, --

21 THE REPORTER: Yeah.

22 BY MR. BENNETT:

23 Q -- Sabrina?

24 A There is no doubt in my mind that she stole
25 from Canal.

1 MR. BENNETT: I have no further questions.

2 Thank you.

3 MS. LAZZARO: Thank you, Ms. Weeks-Brittan
4 for appearing today. This concludes your deposition.

5 Madam Court Reporter, we will follow-up with
6 you with regards to the transcript.

7 THE WITNESS: Thanks, everyone.

8 MR. BENNETT: Diane -- Diana, I'm sorry to
9 -- (Inaudible.)

10 THE REPORTER: Hold on. I need --

11 MR. BENNETT: Thank you, everyone, for your
12 help.

13 THE REPORTER: Hold on. I need Dan for us
14 to take us off.

15 (The remote videotaped deposition concluded
16 at 4:16 p.m.)

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1 REPORTER'S CERTIFICATION

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3 I, Diana Janniere, a Certified Shorthand Reporter,
4 in and for the State of California, do hereby certify:

5

6 That the foregoing witness was by me remotely duly
7 sworn; that the remote deposition was then taken
8 before me at the time and place herein set forth; that
9 the remote testimony and remote proceedings were
10 reported stenographically by me and later transcribed
11 into typewriting under my direction; and that the
12 foregoing is a true record of the remote testimony and
13 remote proceedings taken at that time.

14

15 IN WITNESS WHEREOF, I subscribed my name
16 this 21st day of January, 2022.

17

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21

Diana Janniere

22

Diana Janniere, CSR No. 10034

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24

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DECLARATION ERRATA SHEET

Our Assignment No. 782023

Case Caption: GRAHAM CHASE ROBINSON

vs. ROBERT DE NIRO, ET AL.

DECLARATION UNDER PENALTY OF PERJURY

I declare under penalty of perjury that I have read the foregoing transcript of my remote deposition taken in the above-captioned matter or the same has been read to me, and the same is true and accurate, save and except for the changes and/or corrections, if any, as indicated by me on the DEPOSITION ERRATA SHEET hereof, with the understanding that I offer these changes as if still under oath.

Signed on the day of

, 2022.

SABRINA WEEKS-BRITTAN

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